

EXHIBIT 12

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,

Plaintiff,

vs.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS, LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION.
Defendants.

:
:
:
: Case No.:
:
: 3:23-cv-00243

VIDEOTAPED 30(b)(6) DEPOSITION OF
KRISTA TONGRING

DATE: March 20, 2024
TIME: 1:05 p.m. to 5:43 p.m.
LOCATION: Veritext Legal Solutions
1250 I Street, Northwest
Suite 900
Washington, D.C. 20005

REPORTED BY: Felicia A. Newland, CSR

Veritext Legal Solutions
1250 Eye Street, N.W., Suite 350
Washington, D.C. 20005

A P P E A R A N C E S

On behalf of Plaintiff:

ROBERT D. MACGILL, ESQUIRE

PATRICK J. SANDERS, ESQUIRE

SCOTT E. MURRAY, ESQUIRE (ZOOM)

MacGill, PC

156 E. Market Street

Suite 1200

Indianapolis, Indiana 46204

robert.macgill@macgillllaw.com

scott.murray@macgillllaw.com

patrick.sanders@macgillllaw.com

On behalf of Executive Committee of the Southern
Baptist Convention:

GRETCHEN M. CALLAS, ESQUIRE

Bradley Arant Boult Cummings, LLP

500 Lee Street East

Suite 1600

Charleston, West Virginia 25322

gcallas@jacksonkelly.com

-- and ---

A P P E A R A N C E S (Cont'd)

R. BRANDON BUNDREN, ESQUIRE

Bradley Arant Boult Cummings, LLP

1600 Division Street

Suite 700

Nashville, Tennessee 37203

bbundren@bradley.com

On behalf of Guidepost Solutions, LLC

SCOTT KLEIN, ESQUIRE

ALEX OTCHY, ESQUIRE

Mintz & Gold, LLP

600 Third Avenue

2nd Floor

New York, New York 10016

klein@mintzandgold.com

otchya@mintzandgold.com

On behalf of Southern Baptist Convention:

MATT C. PIETSCH, ESQUIRE

Taylor Pigue Marchetti & Blair, PLLC

2908 Poston Avenue

Nashville, Tennessee 37203

matt@tpmblaw.com

A P P E A R A N C E S (Cont'd)

Also Present:

Gordon Thomas, Videographer.

Also Present Appearing Via Zoom:

Kathy Klein

Gene Besen

Ella Merritt

Jon Anderson

Scarlett Nokes

Pastor Johnny Hunt

C O N T E N T S

EXAMINATION BY:	PAGE
Counsel for Plaintiff	8
Counsel for SBC Executive Committee	259
Counsel for Plaintiff	262

TONGRING DEPOSITION EXHIBITS

NO.	DESCRIPTION	PAGE
105	Krista Tongring LinkedIn	9
106	Second Amended Notice	16
107	Bates Numbers GP_003968 through 3971	123
108	Bates Numbers COC000014 through 16	158
109	Bates Numbers GP_013490 through 13503	160
110	Bates Numbers GP_012582 through 12595	171
111	Bates Numbers GP_016152 through 16155	187
112	Snapshot screen of Guidepost's website	208
113	Guidepost website, SBC Investigation and Report	232

(*Exhibits retained by counsel for Plaintiff.)

P R O C E E D I N G S

* * * * *

VIDEOGRAPHER: Good afternoon. We are going on the record on the 1:05 p.m. on March 20th, 2024. Please note that the microphones are sensitive and may pick up whispering and private conversations. Please mute your phones at this time.

Audio and video recording will continue to take place unless all parties agree to go off the record.

This is Media Unit 1 of the 30(b)(6) deposition of Guidepost Solutions, LLC, on their behalf Ms. Krista Tongring, in the matter of Johnny M. Hunt versus Southern Baptist Convention, et al., filed in the United States District Court for the Middle District of Tennessee, Nashville Division, Case Number 3:23-cv-00243.

The location of this deposition is 1250 I Street, Northwest, Suite 901, Washington, D.C. 20005.

1 My name is Gordon Thomas
2 representing Veritext Legal Solutions. And I'm
3 the videographer. The court reporter is Felicia
4 Newland from the firm Veritext Legal Solutions.

5 Counsel and all present, including
6 remotely, will now state their appearances and
7 affiliations for the record, beginning with the
8 noticing attorney.

9 MR. MACGILL: Rob MacGill and Patrick
10 Sanders on behalf of Pastor Johnny Hunt, the
11 Plaintiff.

12 MR. KLEIN: Good afternoon. Scott
13 Klein. And with me is Alex Otchy, from Mintz &
14 Gold, representing Guidepost, in particular, Krista
15 Tongring, in her role as corporate representative
16 for the 30(b)(6) deposition.

17 MS. CALLAS: Gretchen M. Callas and
18 Brandon Bundren for the Executive Committee of the
19 Southern Baptist Convention.

20 MR. MURRAY: This is Scott Murray
21 from MacGill, PC, also for the Plaintiff, Johnny
22 Hunt.

1 MS. KLEIN: Patty Klein on behalf of
2 Guidepost Solutions.

3 MR. PIETSCH: Matt Pietsch on behalf
4 of Southern Baptist Convention.

5 MR. BESEN: Gene Besen on behalf of
6 the Southern Baptist Convention Executive
7 Committee.

8 MS. NOKES: Scarlett Nokes on behalf
9 of the Southern Baptist Executive Committee.

10 MR. MACGILL: Okay. Do you want to
11 swear the witness?

12 * * * * *

13 Whereupon,

14 KRISTA TONGRING
15 was called as a witness and, having been first duly
16 sworn, was examined and testified as follows:

17 EXAMINATION BY COUNSEL FOR PLAINTIFF

18 BY MR. MACGILL:

19 Q Would you state your name for the
20 record, please?

21 A Krista Tongring.

22 Q And are you appearing today in

1 response to a notice of deposition for a corporate
2 representative of Guidepost?

3 A Yes.

4 Q Okay. Well, let's start with your
5 background. Do you have a LinkedIn profile?

6 A I do.

7 Q All right.

8 MR. MACGILL: Let's put that up as
9 the next exhibit Exhibit 105.

10 (Tongring Deposition Exhibit Number 105
11 marked for identification.)

12 BY MR. MACGILL:

13 Q Ma'am, do you see 105 on the screen?

14 A I don't.

15 Q And is this your --

16 MR. KLEIN: Hold on. She said "I
17 don't" --

18 THE WITNESS: I do not --

19 MR. KLEIN: Does she have to --

20 THE WITNESS: Do I have to click
21 something?

22 MR. MACGILL: You do.

1 MR. KLEIN: You have to -- there's a
2 little bit of --

3 THE WITNESS: Okay.

4 MR. KLEIN: -- role-playing in this.

5 THE WITNESS: That's fine.

6 Okay.

7 BY MR. MACGILL:

8 Q Okay. Have you clicked on it?

9 A I see it.

10 Q And is this -- is Exhibit 105 your
11 LinkedIn profile?

12 A Let me scroll through, please.

13 I'm not sure if it's the entire
14 thing. I don't know if there's a way to make it
15 bigger.

16 Q Do you think something is missing?

17 A Oh, no. It made it bigger. Sorry.
18 Thank you. It's just it's not -- I can't see the
19 whole first page. Sorry --

20 Q Okay. What are --

21 A -- I'm not sure how to make it --

22 Q Okay. Do you --

1 A -- the whole first page come up
2 but --

3 Q If you --

4 A Okay. Hold on. Just a second,
5 please.

6 MR. KLEIN: And, Patrick, I'm fine
7 obviously if you want to help with the technical
8 aspect of it. It's totally up to you.

9 MR. SANDERS: I'm happy to help.

10 THE WITNESS: There we go. Yes, it
11 appears to be a -- some -- like a download or a
12 screenshot of my profile. I haven't looked at it
13 for a while, but that's what it appears to be.

14 BY MR. MACGILL:

15 Q This is your LinkedIn profile?

16 A I just said it appears to be.

17 Q Okay.

18 A I haven't seen one that's been
19 downloaded like this, but it --

20 Q Okay.

21 A -- appears to be, yeah.

22 Q You need -- just -- I'm just -- you

1 say "it appears to be." I -- it sounds like we're
2 going to have some challenges here just on
3 identifying basic things. Is this or is this not
4 your LinkedIn profile, to the best of your
5 knowledge?

6 A Okay. We're not going to have
7 issues. I have never seen it that look this way --

8 Q Okay.

9 A -- so I can't say that it's my
10 LinkedIn profile. What I can say is that the
11 information here is correct, as I understand that
12 it is on my LinkedIn page, but I've not seen my
13 LinkedIn profile in this way.

14 Q Okay. Fair enough.

15 So let's look at page 2 of 2.

16 A Okay.

17 Q Does this page, which is exhibit --
18 page 2 of Exhibit 5, properly summarize your
19 education?

20 A From college forward, yes, it does.

21 Q All right. And you -- you were a --
22 you got a bachelor's degree from Providence

1 College. Is that correct?

2 A That's correct.

3 Q And that degree was awarded in --
4 with a field of study concentrating in sociology?

5 A That's correct.

6 Q The degree was awarded in 1993?

7 A That's correct.

8 Q You graduated from the Seton Hall
9 University School of Law in 1996?

10 A Yes.

11 Q And you attended the executive
12 education course at the University of Notre Dame?

13 A Yes.

14 Q And you attended that during the year
15 2017. Is that right?

16 A It is.

17 Q All right. So if you look at page 1
18 of 2, you'll see that there is -- there's a banner
19 at the left. Do you recognize that banner to be
20 something that's associated with the LinkedIn
21 profile?

22 A I don't.

1 Q Okay. Fair enough.

2 There's a name at the top, "Krista
3 Tongring." Is that you?

4 A It is.

5 Q And is your current -- is your
6 employment experience there summarized properly?

7 A It is.

8 Q Okay. Any inaccuracies in Exhibit
9 105, in terms of your employment experience?

10 A No.

11 Q Now, you had some DEA experience for
12 six years and five months. Did anyone that is
13 currently employed at Guidepost have a background
14 with the DEA as well, to your knowledge?

15 A Currently?

16 Q Yes.

17 A Yes.

18 Q Who?

19 A Do you want me to name all of them?

20 Q How many? Can you -- is it several
21 people?

22 A Yes.

1 Q Can you estimate how many?

2 A About ten.

3 Q Okay.

4 A Maybe more.

5 Q Did you have any role in assisting in
6 securing the employment of any of -- one of those
7 ten or more --

8 A Yes.

9 Q -- people?

10 How many?

11 A At least four, possibly five.

12 Q Okay. Now, I noticed here that you
13 state on this piece of paper that's in front of
14 you, Exhibit 105, or this electronic image, that
15 from November 21 through September 2023, you were
16 employed as a senior managing director. Is that
17 right?

18 A Yes.

19 Q And then you were promoted-- were you
20 promoted to executive vice president?

21 A Yes.

22 Q And your executive vice president

1 role is designated as DEA regulatory compliance
2 practice. What is "DEA"?

3 A Drug Enforcement Administration.

4 Q Okay. What does your practice
5 currently as executive vice president involve, in
6 general terms?

7 A In general terms, we assist DEA
8 registrants in being compliant with DEA controlled
9 substance laws and regulations.

10 Q Can you give us an example of what a
11 registrant would be?

12 A A manufacturer, distributor,
13 pharmacy, hospital, doctor, who holds a DEA
14 registration to handle controlled substances.

15 Q All right. Sir, I wanted to -- sir.
16 Ma'am, I want to go to the next
17 Exhibit. I'm going to put up Exhibit 106.

18 (Tongring Deposition Exhibit Number 106
19 marked for identification.)

20 MR. KLEIN: Same thing, when you see
21 it, just click on it.

22 THE WITNESS: Okay. Thank you.

1 Okay.

2 BY MR. MACGILL:

3 Q Do you that in front of you?

4 A I do.

5 Q Have you read this -- is this a
6 Second Amended Notice of Deposition of Guidepost,
7 LLC?

8 A Yes, that's what it is.

9 Q And when did you read this?

10 A I don't remember the day. Recently.

11 Q Recently you reviewed it?

12 A Yes.

13 Q And can you tell us, are you the
14 representative who has been designated by Guidepost
15 Solutions, LLC to give testimony in connection with
16 this notice of deposition, Exhibit 106?

17 A Yes.

18 Q And could you tell the Court what you
19 did to prepare to give testimony today on the
20 topics listed on Exhibit 106?

21 MR. KLEIN: And I will just advise
22 you, as you know, that you currently can discuss

1 the fact that you may have spoken with counsel,
2 but -- and Rob is not looking for it, do not reveal
3 any of the actual communications that you actually
4 had with us. But with that caveat, you, of course,
5 are free to answer Mr. MacGill's questions.

6 THE WITNESS: Thank you.

7 I met with counsel. I reviewed
8 documents and e-mails. And I believe I
9 communicated with some of my colleagues.

10 BY MR. MACGILL:

11 Q Who were the colleagues you
12 communicated with?

13 A Russ Holske, Samantha Kilpatrick,
14 Julie Myers Wood. I think that was it.

15 Q Okay. What did you speak to Julie
16 Myers Wood about in connection with your
17 preparation?

18 MR. KLEIN: And I would just caution
19 you that if you're discussing a conversation that
20 counsel was on as well, please do not provide that
21 communication, but if it was a conversation with
22 you and Ms. Myers Wood and others with counsel not

1 present, then you are free to provide that
2 information.

3 THE WITNESS: Thank you.

4 Counsel was present during that
5 conversation.

6 BY MR. MACGILL:

7 Q Okay. And when was that conversation
8 with -- and this was the CEO of your company?

9 A Yes.

10 Q Do you report to her in connection
11 with your -- as the executive vice president?

12 A I do.

13 Q Okay. Do you report to anyone else?

14 A I don't.

15 Q Okay. When was that conversation
16 with your boss --

17 A Yesterday.

18 Q -- Ms. Julie Myers Wood?

19 A Yesterday.

20 Q And how long did that take?

21 A I believe it was the -- the entire
22 conversation was approximately a half hour.

1 Q And counsel was present at all times?

2 A Correct.

3 Q And were you there in person with
4 Julie Myers Wood?

5 A No.

6 Q Where was she?

7 A I don't know where she was.

8 Q Where were you?

9 A I was at home.

10 Q And so it was a videoconference?

11 A It was a Teams call.

12 Q Okay.

13 A But we weren't all on video.

14 Q Okay. And Mr. Klein was on that
15 call?

16 A Correct.

17 Q Anyone else?

18 A Mr. Otchy.

19 THE WITNESS: I'm sorry if I'm saying
20 that wrong.

21 MR. OTCHY: That's okay.

22 MR. KLEIN: You're not the first

1 person to.

2 BY MR. MACGILL:

3 Q All right.

4 MR. KLEIN: That's --

5 BY MR. MACGILL:

6 Q So what -- did you review any
7 deposition testimony?

8 A I did not.

9 Q What documents did you review to
10 prepare?

11 A Mostly e-mails or document -- and
12 documents that were attached to e-mails or had been
13 attached to e-mails.

14 Q How much time did you spend reviewing
15 e-mails and documents attached to them?

16 MR. KLEIN: And, Rob, just for
17 clarity, I'm not objecting, but for clarity, are
18 you looking for an answer just regarding her
19 preparation for the corporate representative
20 deposition, because she is being deposed tomorrow
21 in her individual capacity? Just so you're aware,
22 it may be tricky for her to separate the two, but I

1 wanted to raise that.

2 MR. MACGILL: You don't need to
3 separate the two.

4 THE WITNESS: Okay.

5 MR. KLEIN: And that's fine.

6 THE WITNESS: I would say several
7 hours total.

8 BY MR. MACGILL:

9 Q How did you choose the documents and
10 the e-mails that you were going to review?

11 A It was based on the topics.

12 Q I'm sorry?

13 A Based on the topics in the
14 deposition --

15 Q How did you --

16 A -- notice.

17 Q All right. And once you looked --
18 you looked at the topics in Exhibit 106 --

19 A Yes.

20 Q -- and then determined what you
21 thought might be relevant to those topics?

22 A Correct. I was looking for things

1 that might be relevant to those topics.

2 Q All right. Did you review financial
3 records?

4 A I did not.

5 Q Do you have this access to financial
6 records in the ordinary course of business of
7 Guidepost?

8 A I do not.

9 Q Okay. Do you have any access to
10 budget information?

11 A For the company?

12 Q Yes.

13 A No.

14 Q Okay. What did you speak to Mr. --
15 was Mr. -- was counsel present when you spoke to
16 Mr. Holske?

17 A I did not speak to Mr. Holske, but
18 when we communicated, no, counsel was not present.

19 Q How did you communicate?

20 A Over text message.

21 Q Okay. What did you text him about?

22 A How he collected his text messages

1 during the discovery process.

2 Q Why did you ask him that?

3 A Because I wanted to be prepared to
4 answer that question as a 30(b)(6) witness.

5 Q Okay. How did Mr. Holske go about
6 collecting his text messages?

7 A He took screenshots of them and
8 provided them to the IT department of Guidepost.
9 And then I believe he uploaded them to a portal
10 also Relativity for counsel to review.

11 Q What did you speak to Ms. Kilpatrick
12 about?

13 A The same.

14 Q What did she tell you?

15 A That she took screenshots of them and
16 then provided them to -- I'm trying to -- to the IT
17 department.

18 Q Which IT department?

19 A Guidepost. Excuse me.

20 Q Now, just focusing a little bit on
21 your background as you come to give testimony
22 today, is it fair to say that you were involved in

1 drafting the portions of the report that involved
2 Pastor Johnny Hunt?

3 A No.

4 Q Okay. Ma'am, we put in front of you
5 the next exhibit, which is Exhibit No. 1.

6 A Okay.

7 Q Have you seen these interrogatory
8 responses before?

9 A I have.

10 Q And when did you last review those?

11 A I'm not sure. In the last few
12 months.

13 Q Okay. And if you would turn to page
14 2 of 8, there's Interrogatory 1 asking to be --
15 specifically asking your company to identify each
16 individual involved in drafting the portions of the
17 report that involved Johnny Hunt.

18 Do you see that?

19 A I do.

20 Q Okay. And your company answered this
21 specifically in a way differently than you just
22 testified. Did it -- did it not when it said that

1 Krista Tongring, senior managing director, reviewed
2 and edited a portion of the report of a report
3 related to Plaintiff. That was your answer from
4 your company, was it not?

5 MR. KLEIN: Objection.

6 Mischaracterizes her earlier testimony. But she
7 can answer.

8 THE WITNESS: Thank you.

9 Yes. When you asked me did I draft
10 it, I stated no. Reviewed and edited, I did
11 define as differently than drafted.

12 BY MR. MACGILL:

13 Q Okay. So you would -- reviewed and
14 editing, you would not -- strike that.

15 When I asked you whether you reviewed
16 and edited, you denied that because reviewing and
17 editing is not drafting in your view?

18 MR. KLEIN: I believe your question
19 you miss -- you started --

20 MR. MACGILL: All right. Fair
21 enough.

22 MR. KLEIN: -- your question, just to

1 make sure --

2 BY MR. MACGILL:

3 Q So I asked specifically not just a
4 minute ago whether you were involved in drafting
5 the report, and you denied that you were involved
6 in drafting your report, did you not?

7 A You said, "Did you draft the Johnny
8 Hunt portion of the report," and I said, "No."

9 Q Okay. Let me be more specific about
10 what I asked you and your answer will speak for
11 itself, but I will tell you what I asked you.

12 What I asked you specifically, were
13 you, quote, involved in drafting the portions of
14 the report that involved Johnny Hunt? That's
15 exactly what I asked you, ma'am, and you said "no,"
16 did you not?

17 A I said no, that I --

18 Q So --

19 A -- didn't draft report --

20 Q -- the words you parsed --

21 A -- Johnny --

22 Q The word that you parsed just as we

1 began the deposition today --

2 A Okay.

3 Q -- is the word "drafting."

4 A Correct.

5 Q Did you not?

6 And you parsed, quote, drafting to
7 not include reviewed and edited, right?

8 MR. KLEIN: Objection.

9 Argumentative.

10 But you can answer.

11 THE WITNESS: Yeah, that's correct, I
12 did.

13 BY MR. MACGILL:

14 Q Okay. Now, is the kind of parsing of
15 words that we -- we should expect to hear today as
16 the jury and the court listen to your testimony?

17 MR. KLEIN: Objection. Objection.

18 Argumentative.

19 But you can answer.

20 THE WITNESS: You can expect me to
21 answer truthfully.

22

1 BY MR. MACGILL:

2 Q Okay. And we'll parse the words in
3 the -- just like you did not three minutes ago when
4 you edited that you -- you used the word "drafting"
5 in contrast to that word differently than reviewed
6 and edited?

7 MR. KLEIN: Objection.
8 Mischaracterizes her testimony.

9 But you can answer.

10 THE WITNESS: I'm not sure I
11 understand what you -- what your question actually
12 was, so if you could repeat it, that would be
13 really helpful.

14 BY MR. MACGILL:

15 Q Let me got to the next topic.

16 A Okay.

17 Q Will you admit now, without any
18 equivocation on your part, that you, Krista
19 Tongring, were involved in the decision to include
20 the Complainant's allegations against the Plaintiff
21 in the report?

22 A I will.

1 Q Okay. And, in fact, your company
2 admitted that in interrogatory answers that have
3 been filed in this case, right?

4 A I don't recall so you'd have to show
5 the interrogatory answer to me.

6 Q Would you describe Guidepost's
7 decision to include allegations of Pastor Johnny
8 Hunt in the report?

9 A Sure. Our investigators, who were
10 responsible for that section of the report,
11 conducted their investigation. Throughout that
12 investigation, myself and Julie Myers Wood kept in
13 touch with them and apprised of their
14 investigation. At the conclusion of the
15 investigation, we reviewed the section that was
16 prepared of the -- the report.

17 We discussed it internally. There
18 was editing that occurred. And based upon our
19 reliance on their expertise and our belief that it
20 was corroborated by all of the witnesses, and by
21 Mr. Hunt's denial, we determined that it was
22 appropriate to include as something that was

1 covered by Bullet Point 1 of the Messenger's
2 motion.

3 Q When you say you discussed it, that
4 is whether to include to the Complainant's
5 allegations against Pastor Johnny Hunt in the
6 report, who discussed it?

7 A It was discussed internally, among
8 and between myself, Ms. Myers Wood, Mr. Holske,
9 Ms. Kilpatrick. I don't know if I can discuss
10 whether the fact that it was discussed among our
11 counsel.

12 MR. KLEIN: You can say just what you
13 said, you --

14 THE WITNESS: Right.

15 MR. KLEIN: -- can't describe any
16 communications if there were any.

17 THE WITNESS: Okay.

18 MR. KLEIN: But you can say --

19 THE WITNESS: Yes, our --

20 MR. KLEIN: -- that counsel --

21 THE WITNESS: -- our chief legal
22 officer, Mr. Anthony Collura. I recall an e-mail

1 with Mr. Bart Schwartz, our chairman, but I don't
2 recall an actual discussion with Mr. Schwartz. And
3 I believe that's all.

4 BY MR. MACGILL:

5 Q Now, you indicated that the decision
6 to include the Complainant's allegations against
7 Pastor Johnny Hunt in the report, that that
8 decision had been corroborated in some way.

9 Do you recall that testimony?

10 A I'm sorry. If I said "decision," I
11 misspoke. I meant that the allegations had been
12 corroborated. My apologies for misspeaking.

13 Q So you -- you made the judgment that
14 the allegations of whom had been corroborated?

15 A Mrs. [REDACTED]

16 And I -- let me also be very clear.
17 We, as a company, made the determination that the
18 allegations had been corroborated.

19 Q And you're saying that the -- the
20 company included the deliberation of sorts, it
21 included yourself, your CEO Mr. Holske,
22 Ms. Kilpatrick, your chief legal officer, and

1 perhaps your chairman, is that right, Mr. Schwartz?

2 A That's correct.

3 Q All right. Now, the allegations of
4 Mrs. [REDACTED] had been, in your judgment, quote,
5 corroborated, unquote, to some extent. Is that
6 right?

7 A As the 30(b)(6), yes.

8 Q How -- how had the allegations of
9 Mrs. [REDACTED] been corroborated?

10 MR. KLEIN: Objection. I believe
11 it's beyond the scope of the topics, so she is
12 certainly able to answer in her personal capacity.

13 So you can answer in your personal
14 capacity, but I believe it's beyond the scope of
15 the 30(b)(6) topics.

16 THE WITNESS: Thank you.

17 In my personal capacity, as a
18 prosecutor for over a dozen years, I relied on
19 the judgment of our very two seasoned
20 investigators, their interaction with
21 Mrs. [REDACTED] the interviews that they conducted,
22 in addition to Mrs. [REDACTED] including the

1 interview of Mr. Hunt, where he denied that any
2 contact occurred between him and Mrs. [REDACTED]

3 BY MR. MACGILL:

4 Q How were the -- what specific
5 corroboration was there of Mrs. [REDACTED]
6 allegation?

7 MR. KLEIN: Same objection.

8 You can answer in your personal
9 capacity.

10 THE WITNESS: That their --
11 Mr. Blankenship admitted -- or told the
12 investigators that there had been physical sexual
13 contact between Mrs. [REDACTED] and Mr. Hunt, that he
14 was told by Mr. Hunt that that occurred, as well as
15 three other witnesses told the investigators that
16 they were aware that there had been physical sexual
17 contact between Mrs. [REDACTED] and Mr. Hunt, as had
18 been told to them, by Mr. [REDACTED] combined with the
19 fact that then Mr. Hunt denied that any physical
20 sexual contact had occurred when asked by our
21 investigators after having told Mr. Blankenship.
22

1 BY MR. MACGILL:

2 Q Now, with respect to Mr. Blankenship,
3 did you -- did you review the information
4 Mr. Blankenship had provided?

5 MR. KLEIN: Same objection.

6 You can answer in your personal
7 capacity.

8 THE WITNESS: I reviewed the
9 investigator's notes.

10 BY MR. MACGILL:

11 Q And did you understand that he
12 believed -- strike that.

13 Do you understand that
14 Mr. Blankenship included that this interaction
15 between Mr. Hunt and Mrs. [REDACTED] was consensual in
16 nature?

17 MR. KLEIN: Same objection.

18 You can answer in your personal
19 capacity, if you know.

20 THE WITNESS: I recall that.

21 BY MR. MACGILL:

22 Q You recall that to be true, do you

1 not?

2 A I recall that he said that.

3 Q Yes, ma'am.

4 And so when you said this was -- the
5 allegations were corroborated, they were
6 consensual, unquote, interaction between
7 Mrs. [REDACTED] and Johnny Hunt would not corroborate
8 anything in terms of sexual abuse, would it?

9 MR. KLEIN: Objection.
10 Mischaracterizes her testimony. And objection.
11 Beyond the scope.

12 But you can answer in your personal
13 capacity.

14 THE WITNESS: Again, in my personal
15 capacity, our investigators made the judgment, and
16 it was in their judgment capacity that they
17 believed Mrs. [REDACTED] when she stated that it was a
18 nonconsensual sexual encounter and that they
19 believed her over Mr. Blankenship. And we relied
20 on their judgment with -- with all of their
21 encounters with Mrs. [REDACTED] and that's why we
22 believed that it was a nonconsensual encounter.

1 BY MR. MACGILL:

2 Q Did you make that judgment, ma'am,
3 based on your experience as a lawyer and as a
4 prosecutor, that to disregard what Mr. Blankenship
5 said in terms of what he found after interviewing
6 both parties and participating in a meeting with
7 both parties, concluding that this -- this
8 interaction between the two of them was, quote,
9 consensual, unquote?

10 MR. KLEIN: Objection. Beyond the
11 scope.

12 But you can answer in your
13 personally capacity, if you know.

14 THE WITNESS: In my personal
15 capacity, I agreed with their assessment.

16 BY MR. MACGILL:

17 Q So you, for your part, rejected
18 Mr. Blankenship's conclusion that this was a
19 consensual interaction in terms of your decision
20 and your judgment individually to include the
21 allegations made by Mrs. [REDACTED] in the Guidepost
22 report?

1 MR. KLEIN: Same objection.

2 You can answer in your personal
3 capacity.

4 THE WITNESS: I would like for you to
5 repeat that question.

6 BY MR. MACGILL:

7 Q So for your part, when it came to
8 deciding whether you would be in favor of including
9 the allegations of Mrs. [REDACTED] in the report, you
10 decided to give no weight to the conclusion of
11 Mr. Blankenship that the interaction was
12 consensual?

13 MR. KLEIN: Objection.

14 You can answer in your personal
15 capacity.

16 THE WITNESS: I -- I don't believe
17 that we gave Mr. Blankenship's word no weight in
18 the sense that we did include his statements in the
19 report, but by including Mrs. [REDACTED] statements,
20 then yes, I did choose -- I did believe her and her
21 statements and agreed with the assessment of our
22 investigators.

1 BY MR. MACGILL:

2 Q Okay. Now, with respect to these
3 three other witnesses that you made reference to as
4 potentially -- strike that.

5 You made reference to three other
6 witnesses as corroborating the allegations made by
7 Mrs. [REDACTED] Is that right?

8 A I did.

9 Q And these three other witnesses had
10 no firsthand knowledge of the encounter between
11 Mrs. [REDACTED] and Pastor Johnny Hunt. Is that right?

12 MR. KLEIN: Objection. Outside the
13 scope.

14 But you can answer in your personal
15 capacity if you know.

16 THE WITNESS: Yes, that's my
17 understanding.

18 BY MR. MACGILL:

19 Q And you understood as a lawyer,
20 generally speaking, and as a former prosecutor
21 specifically, that you had no firsthand knowledge
22 from any one of these three other witnesses. Is

1 that right?

2 MR. KLEIN: Objection. Asked and
3 answered. Objection. Outside the scope.

4 But you can answer.

5 THE WITNESS: Yes.

6 BY MR. MACGILL:

7 Q All right. And with respect to these
8 three other witnesses, put it in very clear terms,
9 these three witnesses only described what
10 Mrs. [REDACTED] husband told them, right?

11 MR. KLEIN: Same objection.

12 You can answer.

13 THE WITNESS: Yes, that's what I
14 stated.

15 BY MR. MACGILL:

16 Q Now, with respect to the decision to
17 include this, these allegations of Mrs. [REDACTED] in
18 the report, you understood that these allegations
19 were pertaining to an event that had occurred 12
20 years prior?

21 MR. KLEIN: Objection. Outside the
22 scope.

1 You can answer in your personal
2 capacity.

3 THE WITNESS: Yes.

4 BY MR. MACGILL:

5 Q Did you, yourself, read a long
6 summary that Mr. [REDACTED] prepared pertaining to
7 these events?

8 MR. KLEIN: Objection. Outside the
9 scope.

10 You can answer in your personal
11 capacity.

12 THE WITNESS: That Mr. [REDACTED]
13 prepared? I'm not -- I don't remember.

14 BY MR. MACGILL:

15 Q Okay. Let me show it to you and have
16 you take a look at this.

17 A Great. Thank you.

18 MR. KLEIN: This is a previous one,
19 right, Patrick?

20 MR. MACGILL: Correct.

21 BY MR. MACGILL:

22 Q Ma'am, do you have Exhibit 7 in front

1 of you?

2 A I do.

3 Q Have you read -- do you recognize
4 this exhibit?

5 A I would need to look through it. So
6 I'm going --

7 Q Looking at --

8 A -- to do that now.

9 Q Looking at -- let me just ask you to
10 look at page 1 for a minute. Do you see the "[REDACTED]
11 and Alias [REDACTED] Story with Samantha B. Kilpatrick
12 and Russell Holske," and dated March 31, 2022?

13 A I see that.

14 Q Okay. So --

15 MR. KLEIN: Before -- I'm sorry, Rob,
16 to interrupt you. My apologies, before we can go
17 further, and you know this, but as a reminder
18 though, this document is marked attorney's eyes
19 only, so if you are going to read from it, I would
20 ask that you either not or you remove Mr. Hunt --
21 Dr. Hunt, I'm sorry, into a separate Zoom room.

22 And I would remind you,

1 Ms. Tongring, that I would ask you not to read
2 from this document unless and until Dr. Hunt is
3 in a separate Zoom room because the document is
4 marked attorneys' eyes only.

5 Sorry, Rob.

6 BY MR. MACGILL:

7 Q Did you read this 53-page document
8 prior to the time that you participated in the
9 decision to include the allegations of Mrs. [REDACTED]
10 and the Guidepost report?

11 MR. KLEIN: Same objection.

12 But you can answer in your personal
13 capacity.

14 THE WITNESS: I don't recall.

15 BY MR. MACGILL:

16 Q Now, focusing on the decision to
17 include Pastor Johnny Hunt in the report that the
18 Guidepost issued, did any one of these six people
19 who participated in the decision, in addition to
20 yourself, express concerns about including Pastor
21 Johnny Hunt in the Guidepost report?

22 MR. KLEIN: Objection. Outside the

1 scope.

2 But you can answer in your personal
3 capacity.

4 THE WITNESS: I don't understand what
5 you mean by "concerns," so if could you explain.

6 BY MR. MACGILL:

7 Q Well, when I -- what do you -- what
8 do you -- what definition do you have of the word
9 "concern"?

10 A I don't -- I don't know. I need you
11 to explain to me so that I can tell you if we had
12 concerns.

13 Q Okay. So what can -- what concern --

14 A Concern can be for someone's
15 well-being. Concern can be "I think you're doing
16 something wrong. Concern -- I mean, I need --

17 Q Yeah.

18 A -- I need to --

19 Q This is easy. Use the definition you
20 just gave, concerned that you might be doing
21 something wrong --

22 A No.

1 Q -- you can use that definition.

2 Let's use any reservations. Let's use that.

3 MR. KLEIN: You can answer with the
4 same objection. You can answer that one.

5 THE WITNESS: Yes.

6 BY MR. MACGILL:

7 Q Okay. Just so we're clear on my
8 question, so you're giving the court an unqualified
9 statement that no one, to repeat no one, at
10 Guidepost had a single reservation of any kind or
11 nature, including Pastor Johnny Hunt, in the
12 Guidepost report?

13 A When we made the decisions --

14 THE WITNESS: Go ahead. I'm sorry.

15 MR. KLEIN: I was just going to
16 object. I --

17 BY MR. MACGILL:

18 Q Answer the question, ma'am.

19 MR. KLEIN: You can answer. I was
20 just saying I object.

21 BY MR. MACGILL:

22 Q Answer the --

1 MR. KLEIN: In your personal capacity
2 you can answer.

3 BY MR. MACGILL:

4 Q Answer the question.

5 A Can you repeat it, please?

6 Q You heard the question.

7 Did any one, ma'am -- to repeat, did
8 any one of the six people that you named have any
9 reservations of any kind or nature about including
10 Pastor Johnny Hunt in the Guidepost report?

11 MR. KLEIN: Objection.

12 You can answer. Personal
13 competence, but you can answer.

14 THE WITNESS: At the time we
15 determined that we were going to include it, no, no
16 one had any reservations.

17 BY MR. MACGILL:

18 Q Today?

19 A No.

20 Q Okay. So just to be clear, your CEO
21 had no reservations of any kind expressed in your
22 presence ever about including Pastor Johnny Hunt in

1 the report?

2 MR. KLEIN: Objection.

3 You can answer in your personal
4 capacity if you know.

5 THE WITNESS: At the time that we
6 determined that we were including it in the report,
7 no --

8 BY MR. MACGILL:

9 Q Okay.

10 A -- she did not.

11 Q Is there another time where she
12 became concerned about it?

13 A No.

14 Q How about in May of 2022, when --
15 people are starting to notify your company about
16 the report not being truthful, any concerns then
17 about including Pastor Johnny Hunt?

18 MR. KLEIN: Objection. Outside the
19 scope.

20 You can answer in your personal
21 capacity, if you know.

22 THE WITNESS: No.

1 BY MR. MACGILL:

2 Q No.

3 So even when third parties, not
4 involved in the -- in the -- not involved as being
5 named in the report, or otherwise, are expressing
6 concerns about the veracity of the report that you
7 participated in?

8 You, for your part, never had a
9 concern about including Pastor Johnny Hunt in the
10 report, right?

11 MR. KLEIN: Objection. Asked and
12 answered and assumes facts not in evidence.

13 But you can answer in your personal
14 capacity.

15 THE WITNESS: No.

16 BY MR. MACGILL:

17 Q And not a single person, to your
18 knowledge, at your company ever expressed a
19 reservation before or after the report was issued
20 about the inclusion of Pastor Johnny Hunt in the
21 report?

22 MR. KLEIN: Objection.

1 Mischaracterizes her testimony. Now you're asking
2 about the entire company. If you meant that,
3 that's fine, Rob.

4 MR. MACGILL: To her -- to her
5 knowledge.

6 MR. KLEIN: To her knowledge.
7 You can answer in your personal
8 capacity, if you know.

9 THE WITNESS: To my knowledge,
10 despite the fact that various people questioned the
11 veracity of the report that were outside of the
12 company, various people outside of the company, no
13 one within the company who participated in these
14 decisions regretted, thought that we made a wrong
15 decision or expressed reservations about the
16 information that we put in the report.

17 BY MR. MACGILL:

18 Q And your testimony is that, to your
19 knowledge, not a single person at your company,
20 Guidepost, had any reservations about the inclusion
21 of Pastor Johnny Hunt prior to the time that the
22 publication of this report occurred?

1 MR. KLEIN: Objection. Asked and
2 answered.

3 You can answer again.

4 THE WITNESS: My testimony is at the
5 time we determined that we were including the
6 information in the report, no one had a
7 reservation.

8 BY MR. MACGILL:

9 Q Well, Ma'am, you just told this court
10 and jury not a few minutes ago that there was a
11 decision to -- to -- strike that.

12 You just told the court and jury that
13 as to the decision to include Pastor Johnny Hunt as
14 a part of the report, there were six people
15 involved in the decision, including the CEO in
16 addition to yourself, right?

17 A Correct.

18 Q And you're saying there was a meeting
19 that occurred amongst these six people and you
20 about including Pastor Johnny Hunt, and not one
21 person, not one person, expressed a reservation of
22 any kind or nature about including Pastor Johnny

1 Hunt?

2 MR. KLEIN: Objection. She didn't
3 say that all six were involved in that decision.
4 Mischaracterizes her prior testimony. But in her
5 personal capacity, she can answer again.

6 THE WITNESS: So this question is
7 different than my previous answer, so let me
8 clarify. During our deliberative process, we
9 determined -- we discussed whether there was
10 sufficient corroboration, whether we had sufficient
11 corroboration, whether there would be any issues or
12 problems with including this in the report, the
13 information and allegations with regard to your
14 client. That was part of our deliberative process.

15 So, of course, we discussed whether
16 there were concerns, issues, reservations, and
17 things like that. At the conclusion of our
18 deliberative process, we determined that there
19 were no reservations, there were no concerns, and
20 there were no issues and determined that we would
21 include this in our report.

22

1 BY MR. MACGILL:

2 Q Were any reservations expressed in
3 this, quote, deliberative process, end quote, about
4 including Pastor Johnny Hunt?

5 A I don't recall.

6 Q You don't recall a single reservation
7 being expressed about including a 12-year-old
8 allegation of Mrs. [REDACTED] in this report?

9 MR. KLEIN: Objection. Asked and
10 answered.

11 And in your personal capacity, you
12 can answer.

13 THE WITNESS: What I recall is
14 whether we felt that we had sufficient
15 corroboration to include it and the decision was
16 yes.

17 BY MR. MACGILL:

18 Q Ma'am, are you telling this jury that
19 among the six people, including yourself -- six
20 people other than yourself, seven people total,
21 that not one person expressed a reservation of any
22 kind or nature about including a 12-year-old

1 allegation in a report by Guidepost?

2 MR. KLEIN: Objection. Outside the
3 scope. Argumentative. And asked and answered.

4 You can answer again in your
5 personal capacity.

6 THE WITNESS: Sure.

7 First of all, not all of us were on
8 the phone or discussing it at the same time. So
9 when you're saying it's -- it's not all six or
10 seven of us at the same time, again, the
11 discussion was the deliberative process was did
12 we have sufficient corroboration? The end result
13 was we did. If there were concerns, it was
14 whether there was sufficient corroboration. And
15 no, we did not worry about a 12-year-period, and
16 we felt that we had sufficient corroboration.

17 BY MR. MACGILL:

18 Q Not one person raised his or her hand
19 at any time at Guidepost ever about including a
20 12-year-old allegation from Mrs. [REDACTED] in this
21 report?

22 MR. KLEIN: Same objection. Asked

1 and answered.

2 I'll allow you to answer one more
3 time. And I'd like, if we can, to move beyond
4 this. But you can answer one more time.

5 THE WITNESS: No.

6 BY MR. MACGILL:

7 Q Now, with respect to the sufficient
8 corroboration, did any -- did any one of these
9 seven people, which included yourself, raise their
10 hands, so to speak, and say, "Look, these three
11 other, quote, witnesses are only repeating what the
12 husband said," anybody say anything like that,
13 ma'am?

14 MR. KLEIN: Objection. Outside the
15 scope.

16 You can answer in your personal
17 capacity.

18 THE WITNESS: That was taken into
19 consideration when we determined whether there was
20 sufficient corroboration.

21 BY MR. MACGILL:

22 Q Who -- who raised concerns about a

1 12-year-old allegation that is -- that has no
2 independent witness validation of a person who had
3 knowledge of the events?

4 Who raised concerns -- strike that.

5 Let me state it this way: Among the
6 seven people who participated in the decision to
7 include the allegations against Pastor Johnny Hunt
8 in the report, did any one of them specifically
9 address three, quote, corroborating, unquote,
10 witnesses?

11 MR. KLEIN: Objection. Outside the
12 scope.

13 But you can answer in your personal
14 capacity.

15 THE WITNESS: I -- I don't understand
16 your question. I'm sorry.

17 BY MR. MACGILL:

18 Q Ma'am, the obvious point is you
19 have -- you've said there were three witnesses that
20 corroborated -- or were corroborating.

21 Do you recall that line of testimony?

22 A I do.

1 Q And those witnesses had no firsthand
2 knowledge of the events 12 years prior?

3 A Yes, that's correct.

4 Q That's correct, isn't it?

5 And those three witnesses knew only
6 what [REDACTED] [REDACTED] had told them about the event,
7 right?

8 A Absolutely.

9 Q With respect to those two basic and
10 undisputed facts about these three witnesses, did
11 any one of the seven, you at Guidepost, raise
12 concerns about those circumstances?

13 MR. KLEIN: Objection as to form.
14 You can answer in your personal
15 capacity.

16 THE WITNESS: Those facts that you
17 just said were taken into consideration when
18 looking at the totality of the circumstances for
19 corroboration. So you say "raised concerns," I say
20 we considered that.

21 BY MR. MACGILL:

22 Q Okay. Did anyone as they, quote,

1 considered that, using your terminology, as they,
2 quote, considered that, ma'am, did any one express
3 any reservations about -- including Pastor Johnny
4 Hunt based on these three witnesses and those
5 circumstances?

6 MR. KLEIN: Objection.

7 You can answer in your personal
8 capacity.

9 I'd ask you to tone it down a
10 little bit in terms of badgering the witness,
11 Rob. Of course, it's your deposition, but I'd
12 ask you as a courtesy to do that.

13 But you can answer the question.

14 THE WITNESS: Not that I recall.

15 BY MR. MACGILL:

16 Q Okay. Now, focusing on whether there
17 was any, to repeat any, corroboration of any kind
18 or nature of the allegations of Mrs. [REDACTED] did
19 any one of the seven people that participated in
20 the decision, to include Pastor Johnny Hunt, raise
21 a concern about Mr. Blankenship stating that the
22 interactions between those two 12 years prior had

1 been, quote, consensual, unquote?

2 MR. KLEIN: Objection. Outside the
3 scope.

4 You can answer in your personal
5 capacity, if you know.

6 THE WITNESS: No.

7 BY MR. MACGILL:

8 Q Was the issue of consent
9 corroborated?

10 MR. KLEIN: Objection. Outside the
11 scope.

12 You can answer in your personal
13 capacity.

14 THE WITNESS: The issue of consent,
15 was it corroborated?

16 BY MR. MACGILL:

17 Q Yeah. Did anyone -- anyone other
18 than Mr. Blankenship address the issue of consent?

19 A Mrs. [REDACTED]

20 Q Okay. Anyone else?

21 A No.

22 Q Okay. So you have with respect to --

1 A Well, let me amend that.

2 Q You want to amend what?

3 A The fact that I said it wasn't
4 corroborated.

5 Q Okay. So you want to amend the
6 testimony that you gave?

7 A Yes.

8 Q Okay. Please do.

9 A We felt that it was partially
10 corroborated when your client lied about having
11 contact with her.

12 Q Okay. When our client lied about
13 having contact with her?

14 A Uh-huh.

15 Q Okay. And what lie are you referring
16 to?

17 A The fact that when he was asked by
18 Ms. Kilpatrick and Mr. Holske whether they had any
19 contact whatsoever, that he denied it.

20 Q Okay. Now, are you aware of the
21 circumstances of that interview that you're just
22 referring to?

1 A Yes.

2 Q Was that an ambush interview, ma'am?

3 MR. KLEIN: Objection as to --

4 objection. Outside the scope.

5 BY MR. MACGILL:

6 Q Would you --

7 MR. KLEIN: And -- let me finish the

8 objection.

9 You can answer in your personal
10 capacity, you can answer his question.

11 BY MR. MACGILL:

12 Q Was that an ambush interview, ma'am,
13 of Pastor Johnny Hunt?

14 MR. KLEIN: Objection as to form.

15 You can answer.

16 THE WITNESS: I don't believe so.

17 BY MR. MACGILL:

18 Q Okay. Did they -- did your company
19 take any steps, just in terms of it being a
20 fair-and-balanced entity, doing an independent
21 investigation give Pastor Johnny Hunt any notice in
22 advance of the topics that would be covered in this

1 interview?

2 MR. KLEIN: Objection as to form.

3 And outside the scope.

4 But you can answer in your personal
5 capacity.

6 THE WITNESS: I don't recall.

7 BY MR. MACGILL:

8 Q You don't recall, but you do
9 recall --

10 A I recall that it was a followup to
11 their first interview, but I don't recall if there
12 was a set of topics provided ahead of time. We
13 typically didn't provide topics.

14 Q Well, that's not --

15 A Wouldn't --

16 Q -- true -- that's not true, ma'am.

17 You were provided a list of topics to the [REDACTED]
18 before you interviewed them on multiple occasions,
19 did you not?

20 MR. KLEIN: Objection as to form.

21 Outside the scope.

22 You can answer in your personal

1 capacity, if you know.

2 THE WITNESS: That, I don't know.

3 BY MR. MACGILL:

4 Q Let me rephrase the question. Let
5 me rephrase the question. I'm going to make a
6 question out of a statement.

7 MR. KLEIN: Thank you.

8 BY MR. MACGILL:

9 Q It's a fact, isn't it, that your
10 company gave advance notice to the [REDACTED] of
11 topics that they would be addressing during the
12 time that your company would on occasion interview
13 them. Is that right?

14 MR. KLEIN: Objection. Outside the
15 scope.

16 You can answer in your personal
17 capacity if you know.

18 THE WITNESS: I don't know.

19 BY MR. MACGILL:

20 Q You don't know?

21 Well, ma'am, you were participating
22 in a decision as to whether or not this should be

1 published. You don't know what kind of, quote,
2 care and feeding, unquote, there was by your copy
3 of the [REDACTED]

4 You're not aware of that?

5 MR. KLEIN: Objection as to form.
6 Compound and outside scope.

7 But you can answer, if you can.

8 THE WITNESS: I am not aware of
9 whether they were given topics to discuss ahead of
10 time.

11 BY MR. MACGILL:

12 Q How could you then make a decision if
13 you thought -- strike that.

14 As an individual investigatory body,
15 and one making a decision on whether to include
16 allegations like those made against Pastor Johnny
17 Hunt, wouldn't you need to know whether there was
18 advanced notice given to the [REDACTED] about topics
19 that they were going to be interviewed upon?

20 MR. KLEIN: Objection. Outside the
21 scope.

22 You can answer in your personal

1 capacity.

2 THE WITNESS: I don't believe so.

3 BY MR. MACGILL:

4 Q Now, you -- I used the phrase "care
5 and feeding." You understand -- you've heard that
6 phase or understand the meaning of that phrase in
7 connection with your work as a prosecutor, right?

8 A I've never heard that phrase before.

9 Q Okay. You don't understand the
10 concept of the, quote, care and feeding of
11 witnesses, the kind of -- the kind of reference
12 that that makes?

13 You don't understand that?

14 A I don't. I've never heard that
15 phrase before.

16 Q Okay. Never seen that in DoJ
17 documents that have been published?

18 A I just said that I've never heard
19 that phrase before.

20 Q Okay. Do you understand -- you
21 understand that with respect to the [REDACTED] there
22 were multiple interviews that were made?

1 MR. KLEIN: Objection. Outside the
2 scope.

3 But you can answer.

4 THE WITNESS: Yes, I do understand
5 that.

6 BY MR. MACGILL:

7 Q How many interviews -- tell the court
8 and jury here how many times your company in
9 connection with its, quote, independent, unquote,
10 investigation.

11 MR. KLEIN: Objection.

12 BY MR. MACGILL:

13 Q The number of interviews that your
14 company conducted of the [REDACTED]

15 MR. KLEIN: You can answer.

16 THE WITNESS: I don't know.

17 BY MR. MACGILL:

18 Q Can you estimate it?

19 A I would say probably at least five,
20 if not more.

21 Q How many interviews did your company
22 engage in with Pastor Johnny Hunt?

1 A Two.

2 Q Ma'am, I'm going to refer you to the
3 next document. This is going to be Exhibit 1.
4 This is -- if you click on Exhibit 1 --

5 MR. KLEIN: She already has access to
6 that document.

7 THE WITNESS: Yeah. I see that.
8 Thank you.

9 MR. KLEIN: Yeah.

10 BY MR. MACGILL:

11 Q If you look at Interrogatory No. 2,
12 can you see there with your own eyes that there are
13 11 interviews of these -- of the [REDACTED] that are
14 referenced in your company's interrogatory
15 response?

16 A I'm counting.

17 Actually I counted 12.

18 Q Okay. Now, with respect to these 12
19 interviews, do you find --

20 A One, two, three --

21 MR. KLEIN: Hold on, Rob, she's still
22 counting.

1 MR. MACGILL: She's still counting.

2 Okay. Good. Got it.

3 BY MR. MACGILL:

4 Q Keep counting, please.

5 A Nope, you were right, 11.

6 Q All right.

7 A Sorry.

8 Q So you now know that -- did you know
9 it before coming here today?

10 A I have seen that before, but I just
11 didn't recall.

12 Q You didn't recall there were 11
13 interviews by your company?

14 A I don't -- so from what I -- what I
15 recall of the interaction with Mr. and Mrs. [REDACTED]
16 not all of these I would characterize as actual
17 interviews. There was a lot of interaction with
18 the [REDACTED] about whether or not they even wanted
19 to come forward. We didn't know the extent, I
20 believe, of -- I don't even think we knew who
21 the -- who Mr. Hunt was in the very beginning when
22 Mr. [REDACTED] first reached out. So I don't know that

1 I would characterize all of these as quote,
2 unquote, interview, what I would define as an
3 interview, but, yes, there were 11 interactions
4 according to this of either Mr. and Mrs. [REDACTED]
5 individually or together.

6 Q Again, parsing words, you're --
7 you're calling this listing interactions, not
8 interviews, right?

9 MR. KLEIN: Objection.
10 Mischaracterizes her testimony.

11 THE WITNESS: I'm just trying to
12 explain.

13 MR. KLEIN: You can answer.
14 BY MR. MACGILL:

15 Q You're parsing words again. And
16 you're saying these are not interviews, these are
17 interactions in your judgment. Is that right?

18 MR. KLEIN: Objection.
19 Argumentative. And mischaracterizes her testimony.
20 But you can answer in your personal
21 capacity.

22 THE WITNESS: I stand by what I said.

1 BY MR. MACGILL:

2 Q Okay. Now, when you parsed the words
3 and you characterized these as not as interviews,
4 but interactions. Do you know that your company
5 was giving on its oath the description of the
6 number of interviews that had occurred?

7 Did you know that?

8 MR. KLEIN: Objection.
9 Argumentative.

10 You can answer.

11 THE WITNESS: I know what the
12 interrogatory was responding to, yes.

13 BY MR. MACGILL:

14 Q And the interrogatory -- let's read
15 it together. Could you read out loud the first
16 sentence in to Interrogatory No. 2?

17 A "Did Guidepost conduct any interviews
18 of the Complainant, Johnny Hunt, or any other
19 person related to the Complainant's allegation
20 against Johnny Hunt?"

21 Q Now --

22 A Do you want me to continue?

1 Q I think that's good. I think that
2 confirms --

3 A Okay. Great.

4 Q -- that your company, on its oath,
5 answered the -- described the number of interviews,
6 didn't it?

7 And it described 11 interviews,
8 right?

9 A It did.

10 Q And not only was this answered that
11 way, but that particular response, like all the
12 others, was verified to be truthful on the oath of
13 your chief legal officer, wasn't it?

14 A I don't know who signed it, but --

15 Q Well, let's --

16 A -- if you tell me that --

17 Q -- look -- let's took --

18 A Okay.

19 Q -- to make sure you're comfortable
20 with understanding the solemn nature of the
21 undertaking by your company in connection with
22 providing this testimony?

1 A Yes --

2 Q Yes?

3 A -- it was Mr. Collura.

4 Q And what he said was that he's chief
5 legal officer of Guidepost, right?

6 A He is, chief operating officer and
7 chief legal officer.

8 Q And he said, "I have personal
9 knowledge of the information set forth in the
10 answers to the foregoing interrogatories," right?

11 A He did.

12 Q And not only that, he said that he
13 declared under 28 United States Code 1746, under
14 penalty of perjury, that the foregoing answers to
15 those interrogatories are true and according to the
16 best of my knowledge, information, and belief,
17 right?

18 A He did.

19 Q Okay. He swore to the fact there
20 were 11 interviews on one part of this, quote,
21 independent, unquote investigation, right?

22 A I wouldn't put quotes around it, but

1 he did swear to that.

2 Q All right. And on -- when you looked
3 at another -- another part of this, that is Pastor
4 Johnny Hunt, your testimony is that there were
5 three interviews?

6 A I believe I said two.

7 Q Two. Fair enough.

8 Now -- but let's parse -- let's parse
9 the interviews of Pastor Johnny Hunt. Tell this
10 court and this jury, Ma'am, how many, quote,
11 interviews, unquote, there were of Johnny Hunt
12 pertaining to the allegations at issue or raised in
13 your report on the Guidepost?

14 MR. KLEIN: Objection. Outside the
15 scope.

16 You can answer.

17 THE WITNESS: I believe there was
18 one.

19 BY MR. MACGILL:

20 Q One.

21 So you have 11 interviews on one side
22 of this, allegations associated with the [REDACTED]

1 and you have one interview of Pastor Johnny Hunt,
2 right?

3 MR. KLEIN: You can answer.

4 THE WITNESS: Yes.

5 BY MR. MACGILL:

6 Q So let's go back. So now we know
7 that there are seven of you, not just one, two or
8 three, but there are seven of you at Guidepost that
9 are making the decision to include allegations of
10 Johnny Hunt.

11 Did any one of you raise a concern to
12 the effect that, "Hey, we've got 11 interviews of
13 the [REDACTED] on the one hand by our investigators at
14 Guidepost and we have one interview of Pastor
15 Johnny Hunt"?

16 Anybody raise a concern like that?

17 MR. KLEIN: Objection. Outside the
18 scope.

19 You can answer in your personal
20 capacity, if you know.

21 THE WITNESS: Not that I recall.
22

1 BY MR. MACGILL:

2 Q Now, after the first [REDACTED]
3 interview, did you get a text from Mr. Holske about
4 that first interview?

5 Did you get a text --

6 A Can I --

7 Q Let me re --

8 A Can I try and --

9 MR. KLEIN: She wants to process.

10 THE WITNESS: -- go through my
11 memory?

12 I possibly did. I -- I somewhat
13 remember that, but if there's a document that
14 would refresh my memory, that would be really
15 helpful.

16 BY MR. MACGILL:

17 Q Okay. Do you recall -- you said you
18 remember -- do you recall Mr. Holske sending you a
19 text immediately after his first [REDACTED] interview?

20 A Possibly.

21 Q Okay. Did you read that in
22 preparation for your testimony here today?

1 A No.

2 Q You don't recall? You didn't read
3 it?

4 A No.

5 Q Okay. Take a look at Exhibit 6 on
6 your computer if you would, please.

7 Do you have Exhibit 6 in front of
8 you?

9 A I am pulling it up now. I see it.

10 Q And is this, Ma'am, is Exhibit 6 a
11 text that Mr. Holske sent to you immediately after
12 the first [REDACTED] interview?

13 A No.

14 Q When did -- when was this sent to
15 you?

16 A Well, it wasn't after the first
17 [REDACTED] interview. It wasn't after the first time
18 he talked to [REDACTED] because he just said, "I just
19 spoke to [REDACTED] again."

20 Q Go back to the -- the
21 interrogatory -- the interrogatory answers that
22 were given to us by your company said that the

1 February 11th, 2022, was the first interview made
2 of the Complainant's husband by Russell Holske.

3 A Oh, I see. Then that explains it
4 when I was talking about interactions. So you're
5 right, I was wrong. Those were the interviews that
6 we did -- that we did. And I was talking about
7 interactions, which were obviously not included in
8 that list, so I was wrong. I apologize.

9 Q Let's go back to the text.

10 A Okay. I'm here.

11 Q So on February 11, 2022, you get a
12 text from Mr. Holske where he says, quote, Give me
13 a call when you can. Just spoke to [REDACTED] again and
14 he opened up.

15 A Uh-huh.

16 Q Okay. You got that text?

17 A I see it, yes --

18 Q And he --

19 A -- I do.

20 Q And he also says to you, "It's all
21 that I thought and more."

22 A Uh-huh.

1 Q Okay. And did you respond to that?

2 A I did.

3 Q And you said. "Okay. Will call
4 soon."

5 A Uh-huh.

6 Q Now, ma'am, at this time you were --
7 you were operating at Guidepost in the context
8 where you had not one new allegation of sexual
9 abuse to report, right?

10 MR. KLEIN: Objection as to form.

11 THE WITNESS: I don't understand what
12 you mean.

13 BY MR. MACGILL:

14 Q It's crystal clear, ma'am. As of
15 February 11, 2022, you don't have evidence of any
16 new allegation of sexual abuse involving an
17 executive committee member as of that time?

18 A Oh, are you talking about Bullet
19 Point 1?

20 Q My question stands.

21 A Okay.

22 MR. KLEIN: You can answer that

1 question. That's one of the topics that was
2 raised.

3 THE WITNESS: Oh, okay.

4 No, that's correct.

5 BY MR. MACGILL:

6 Q Okay. So the context when you get
7 this text is you have no new allegations of sexual
8 abuse involving any executive committee member, and
9 now for the first time you have a reference to what
10 we see from Mr. Holske to you in this text. Is
11 that right?

12 A Well, that wasn't the first time I
13 had heard about it, but yes, this is the first
14 reference in this text.

15 Q So now for the first time you have a
16 possibility of including something new in a report
17 about sexual abuse involving executive committee
18 members that the SBC or the executive committee had
19 not seen before, right?

20 A Yes.

21 Q Okay.

22 A That's correct.

1 Q And you responded very quickly, you
2 responded, "Okay. Will call you soon," right?

3 A That's --

4 MR. KLEIN: Objection as to form.

5 THE WITNESS: -- what I said.

6 MR. KLEIN: You can answer. You
7 already did.

8 THE WITNESS: Sorry.

9 MR. KLEIN: That's okay.

10 THE WITNESS: That's what I said,
11 yes.

12 BY MR. MACGILL:

13 Q And then you said -- did you text
14 back, "Hey just wanted to see if you were able to
15 send Julie something short tonight like what we
16 discussed on call." Is that right?

17 A That's correct.

18 Q And had you discussed on
19 February 11th, 2022, the conversation or the
20 interview that was had by Mr. Holske with Mr. [REDACTED]

21 [REDACTED]

22 A I believe so, yes.

1 Q And so you wanted to get this news
2 to -- to the CEO of the company that night. Is
3 that right?

4 A That's what I see in my text message.

5 Q Let's pause here for a minute. And I
6 you -- I want you to tell the court and jury how
7 much money had your company spent at this time on
8 the investigation as of this date?

9 A No idea.

10 Q No idea.

11 Had you spent by this time hundreds
12 and hundreds of thousands of dollars and not found
13 one new allegation of any sexual abuse alleged as
14 against any executive committee member?

15 MR. KLEIN: Objection. Outside the
16 scope.

17 You can answer in your personal
18 capacity.

19 THE WITNESS: I don't know how much
20 money we had spent.

21 BY MR. MACGILL:

22 Q You can't even affirm to the jury now

1 that hundreds of thousands of dollars had been
2 spent without finding any new allegations as of
3 February 11, 2022?

4 MR. KLEIN: Objection. Asked and
5 answered. Outside the scope.

6 You can answer again in your
7 personal capacity.

8 THE WITNESS: I don't know.

9 BY MR. MACGILL:

10 Q Well, this was an exciting event for
11 you, wasn't it, February 11th, because knew you had
12 something to report to Guidepost possibly --

13 MR. KLEIN: Objection.

14 BY MR. MACGILL:

15 Q -- that was new, right?

16 MR. KLEIN: Objection as to form.

17 You can answer if you know.

18 THE WITNESS: I do not characterize
19 somebody reporting a possible sexual assault as
20 exciting.

21 BY MR. MACGILL:

22 Q Well, ma'am, this was -- this was a

1 12-year-old allegation. You were going to settle
2 for anything you could at that point in time on
3 February 11th, 2022 because you, and those working
4 in concert with you at Guidepost, didn't have
5 evidence of a single allegation of sexual because
6 that was new, right?

7 THE WITNESS: No.

8 MR. KLEIN: Objection. Asked and
9 answered. You can answer.

10 BY MR. MACGILL:

11 Q But, Ma'am, you -- you then contend,
12 "If I can definitely do it, I just don't want -- I
13 just don't want to duplicate work, let me know."
14 And then he said to you, "Already sent it," right?

15 A That's what's written there.

16 Q And so you wanted right away to get
17 this news of this possible witness of a 12-year-old
18 allegation to your CEO of your company pronto,
19 correct?

20 MR. KLEIN: Objection. Outside the
21 scope.

22 You can answer in your personal

1 capacity.

2 THE WITNESS: Well, it appears it was
3 five hours later, but it was that night.

4 BY MR. MACGILL:

5 Q Okay. But you -- Ma'am, your --
6 you're doing this at night, this is -- at what
7 time? 9:15?

8 A I can't do the math on --

9 Q It's 21 --

10 A -- military time, but --

11 Q Right.

12 A -- I'll take your word for it.

13 Q Well, you're writing at 9:15 at night
14 to get to -- to get this information to the CEO of
15 your company, right?

16 A I consistently work very late hours,
17 not just on this case.

18 Q So this wasn't unusual --

19 A It was not.

20 Q -- for you to be sending a text --
21 ma'am, I -- I -- can you point me -- point out to
22 me any other text that you sent on this matter at 9

1 o'clock at night?

2 MR. KLEIN: Objection. Outside the
3 scope.

4 THE WITNESS: Yes --

5 MR. KLEIN: You may answer in your
6 personal capacity.

7 BY MR. MACGILL:

8 Q You --

9 A -- I could.

10 Q Tell -- tell me -- we've had the
11 chance to read everything, too.

12 Now, can you -- tell me when you
13 texted on this Guidepost report at 9 o'clock at
14 night.

15 MR. KLEIN: Objection. Outside the
16 scope.

17 You can answer if you can.

18 THE WITNESS: I -- you want me to
19 know -- I don't have a text in front of me, but I
20 can tell you that when the report was submitted to
21 the Task Force, I spent -- stayed up the entire
22 night and I was e-mailing and texting.

1 BY MR. MACGILL:

2 Q Okay. Prior to that, prior to
3 May 2022, when, other than in this e-mail,
4 Exhibit 6, were you texting on this matter at 9
5 o'clock at night?

6 MR. KLEIN: Objection as to form.

7 You can answer again if you can in
8 your personal capacity.

9 THE WITNESS: I can tell you that it
10 was my practice to consistently work at late so
11 that I could spend evenings with my daughter, but I
12 can't give you a specific text, so I apologize.

13 MR. KLEIN: Rob, at a convenient
14 point if we can just take a break, whenever it's
15 convenient for your questioning.

16 MR. MACGILL: Yeah, let me just --

17 MR. KLEIN: Go ahead.

18 MR. MACGILL: I have a question.

19 BY MR. MACGILL:

20 Q Was there a discussion among the
21 seven of you who decided to move forward with the
22 allegations or report which -- let me start over.

1 Did the seven of you that
2 participated in the decision to include Pastor
3 Johnny Hunt in the report discuss whether the
4 allegations that were made by Mr. and Mrs. [REDACTED]
5 fell within the scope of the engagement?

6 A Yes.

7 Q And who discussed --

8 A Well --

9 Q Who had those discussions?

10 A Yes. Who had those discussions? I
11 am trying to think specifically. I believe it was
12 at least me and -- and I don't know that if this
13 was an actual conversation or it was over e-mail,
14 but I would say at least me and Samantha and
15 Russ -- I'm sorry, Ms. Kilpatrick and Mr. Holske.
16 And I would -- and -- and Julie, excuse me,
17 Ms. Myers Wood.

18 Q So the four of you would exchange
19 ideas on whether Pastor Johnny Hunt's 12-year-old
20 allegation was within the scope of the engagement?

21 A Yes.

22 Q And what was -- what was said?

1 A The -- the discussion was, "Was it
2 within the scope of the engagement?" And the
3 conclusion was yes, that it was.

4 Q What was your -- what did you
5 conclude on that point?

6 A That it was.

7 Q Why?

8 A Because he was a former EC president
9 who began grooming Mrs. [REDACTED] during his
10 presidency. I believe it was presidency. I could
11 be wrong on the president, but he was either
12 president or trustee. I can't remember that part.
13 I think it was president.

14 Q So you made the decision for your
15 part to be, you felt -- strike that.

16 You felt for your part that it was
17 appropriate to include Pastor Johnny Hunt's
18 12-year-old interaction with Mrs. [REDACTED] for what
19 reason?

20 A Because he was a former president
21 and --

22 Q Of what?

1 A Again, I -- this is what I was going
2 back and forth with myself, I believe of the SBC.
3 Sometimes I get the SBC EC and the SBC confused in
4 that regard. And he began grooming Mrs. [REDACTED]
5 which led to the ultimate abuse while he was the
6 SBC president.

7 Q When was he SBC president?

8 A I can't remember.

9 Q Well, what information did you have
10 at the time you made this decision to --

11 A We had an org chart of all of the
12 presidents and trustees and everything throughout
13 the time period.

14 MR. KLEIN: I would just ask that you
15 make sure you let Mr. MacGill --

16 THE WITNESS: Sorry.

17 MR. KLEIN: -- finish asking his
18 question --

19 THE WITNESS: Sorry.

20 MR. KLEIN: -- before you --

21 THE WITNESS: Sorry.

22 MR. KLEIN: -- answer.

1 THE WITNESS: Sorry. I apologize.

2 MR. KLEIN: It also helps out with
3 the court reporter who --

4 THE WITNESS: I'm sorry.

5 BY MR. MACGILL:

6 Q Where was the incident -- where was
7 the instance first? What state?

8 A I don't recall off the top of my
9 head. I know it was at the beach.

10 Q When was the incident? What time of
11 year?

12 A I don't know.

13 Q I'm sorry?

14 A I don't know.

15 Q Was Mr. -- was Pastor Johnny Hunt the
16 president of the SBC at the time of this incident
17 alleged by Mrs. [REDACTED]

18 A No.

19 Q Was he president of the SBC during
20 the time period covered by the engagement?

21 MR. KLEIN: When you say
22 "engagement," Rob, just --

1 MR. MACGILL: Of Guidepost.

2 MR. KLEIN: -- the engagement letter
3 between Guidepost and SBC?

4 MR. MACGILL: Yes.

5 THE WITNESS: Yes.

6 BY MR. MACGILL:

7 Q Okay. Now you said he began grooming
8 Mrs. [REDACTED] while he was SBC president. What
9 evidence did you have of that at the time you made
10 this decision to include him in the report?

11 A Mrs. [REDACTED] statements.

12 Q Specifically what did she say?

13 A I believe that she said that he
14 kissed her inappropriately and said inappropriate
15 things to her. He did things to -- actually, no,
16 not the kissing. He did things to get close to
17 her, made inappropriate comments to her. I can't
18 remember what else.

19 Q Was the fact that Pastor Johnny Hunt
20 was not on the Executive Committee at the time of
21 the alleged incident discussed by you or any one of
22 the four that made this decision that this incident

1 fell within the scope of the report?

2 A Yes.

3 Q Okay. What was discussed about that?

4 A Whether it precluded it.

5 Q Okay. You knew that he was not on
6 the Executive Committee at the time of that alleged
7 incident, right?

8 A Yes.

9 Q And that was discussed openly amongst
10 the four of you, Ms. Kilpatrick, Mr. Holske,
11 yourself, and your CEO?

12 MR. KLEIN: Objection. Asked and
13 answered.

14 You can answer again.

15 BY MR. MACGILL:

16 Q Right?

17 A I don't -- again, I don't remember if
18 it was all four of us. At one time it was a
19 discussion.

20 Q And every one of those four people
21 knew that Pastor Johnny Hunt was not on the
22 Executive Committee at the time of the alleged

1 incident, right?

2 A Uh-huh.

3 Q Okay.

4 A Yes.

5 Q Did any one of the four of you make
6 mention of the fact that these allegations were
7 outside the scope of the engagement of Guidepost?

8 MR. KLEIN: Objection. Asked and
9 answered.

10 You can answer.

11 THE WITNESS: No. We determined that
12 it was within the scope.

13 BY MR. MACGILL:

14 Q Because of grooming?

15 A Correct.

16 Q Because of the allegations of
17 grooming made by Mrs. [REDACTED]

18 A Correct.

19 Q What corroboration did you have of
20 those, quote, grooming, unquote, allegations?

21 MR. KLEIN: Objection as to form.

22 You can answer.

1 THE WITNESS: We believed

2 Mrs. [REDACTED]

3 BY MR. MACGILL:

4 Q Okay. Did you have any corroboration
5 other than the words that she spoke about events
6 that occurred 12 years or more prior to your
7 report?

8 A I'm not certain. I'd have to go back
9 to the note.

10 Q So when it came to grooming, you're
11 not aware, as you sit here today, having prepared
12 for this deposition of any evidence of any kind or
13 nature that would corroborate statements by
14 Mrs. [REDACTED] that there had been grooming by Pastor
15 Johnny Hunt?

16 A Again, I'm not sure.

17 MR. MACGILL: Let's go ahead and take
18 a break.

19 MR. KLEIN: Great.

20 VIDEOGRAPHER: The time is 2:18 p.m.
21 We are going off the record.

22 (Recess from 2:18 p.m. to 2:33 p.m.)

1 VIDEOGRAPHER: The time is 2:33 p.m.

2 We are going back on the record.

3 Please proceed, Counsel.

4 BY MR. MACGILL:

5 Q Welcome back, ma'am.

6 I want to follow up on where we left
7 off. You indicated that you -- do you remember the
8 line of testimony you just gave where you described
9 that the decision was made to include Pastor Johnny
10 Hunt in the report because he fit within the
11 engagement as having groomed Mrs. [REDACTED] according
12 to her, when he -- when he was president of the
13 SBC?

14 Do you recall that line of testimony?

15 A Yes.

16 Q Okay. Now, just following up on this
17 decision to include Johnny Hunt, there were --
18 there was an analysis of different things that you
19 talk about today by the seven of you, right?

20 For example, whether the allegations
21 were corroborated, correct?

22 A Yes.

1 Q There was also an evaluation of
2 whether this 12-year-old allegation even fit within
3 the terms of the engagement, right?

4 A By the seven of us? No, I don't
5 believe I said that. I said there was -- that was
6 discussed between the four of --

7 Q The four --

8 A -- us.

9 Q -- of you. Yeah.

10 So the four of you, that would be --
11 the four of you that included the scope of the
12 engagement and whether that was a limit on
13 including Pastor Johnny Hunt, that included just
14 yourself, Ms. Kilpatrick, Mr. Holske, and the CEO
15 of the company, right?

16 A That's correct.

17 Q It did not include your chief legal
18 officer, right?

19 A To my recollection, no.

20 Q It didn't include Mr. Bart Schwartz,
21 the chairman of your company, right?

22 A To my recollection, no.

1 Q Okay. But it included at least the
2 four of you that also participated in -- in
3 determining whether the allegations of Mrs. [REDACTED]
4 were corroborated, correct?

5 A Yes.

6 Q Okay. Now, when you looked at the
7 issue of corroboration yourself, and the issue of
8 whether this incident even fell within the scope of
9 the report, did anyone express reservations at any
10 time about including Pastor Johnny Hunt?

11 MR. KLEIN: Objection as to form.
12 Asked and answered.

13 You can answer.

14 THE WITNESS: I stand by my previous
15 answers.

16 BY MR. MACGILL:

17 Q Okay. Did -- so there were no
18 reservations expressed at any time by anybody on
19 any of these things that we've talked about today,
20 whether Pastor Johnny Hunt was included by virtue
21 of the timing of the -- the scope of the engagement
22 and whether the allegations were corroborated?

1 MR. KLEIN: Objection as to form.

2 You can answer.

3 THE WITNESS: I stand by my previous
4 answers.

5 BY MR. MACGILL:

6 Q Okay. So -- so we're clear, no one
7 ever raised any concerns at any time about --
8 including Pastor Johnny Hunt in the report ever to
9 your knowledge?

10 MR. KLEIN: Objection as to form.

11 You can answer.

12 THE WITNESS: I stand by my previous
13 answer.

14 BY MR. MACGILL:

15 Q Which is no one ever did?

16 A Those were not my previous answers.

17 Q Those were not?

18 A I explained to you our process --

19 Q Right.

20 A -- I explained to you that we
21 deliberated, that we may have talked about, "Are
22 they corroborated? Are they not? Are there -- is

1 this there? Is there that?"

2 I didn't say that there weren't any
3 ever reservations or concerns. I said that we
4 talked through things and ultimately the decision
5 was there were no reservations, there were no
6 concerns, and we were including it.

7 Q Prior to the decision, what
8 reservations or concerns were raised by any one of
9 the seven people?

10 A There were discussions as to was
11 there sufficient corroboration? Did it fall within
12 the scope as we've discussed? And, again, the
13 ultimate decision was there was sufficient
14 corroboration and it fell within the scope.

15 Q Who raised issues about whether there
16 was sufficient corroboration as to -- in -- in
17 connection whether to include Pastor Johnny Hunt?

18 MR. KLEIN: Objection. Outside the
19 scope.

20 You can answer in your personal
21 capacity.

22 THE WITNESS: It was a discussion

1 point. It wasn't somebody raising an issue.

2 BY MR. MACGILL:

3 Q Did it -- who -- who spoke about it?

4 A We all did.

5 Q Okay. So everyone spoke to some
6 extent on whether there was sufficient
7 corroboration for the allegations?

8 A Correct.

9 Q You did?

10 A Correct.

11 Q The CEO of your company raised --
12 participated in that discussion as to whether there
13 was sufficient corroboration?

14 MR. KLEIN: Same objection.

15 You can answer.

16 THE WITNESS: Correct.

17 BY MR. MACGILL:

18 Q All right. Mr. Holske did?

19 MR. KLEIN: Same objection.

20 You can answer.

21 THE WITNESS: Correct.

22

1 BY MR. MACGILL:

2 Q Each and every one of the seven of
3 you, to one extent or another, addressed the issue
4 of whether or not there had been sufficient
5 corroboration to include Pastor Johnny Hunt in the
6 report. Is that right?

7 MR. KLEIN: Same objection.

8 You can answer in your personal
9 capacity.

10 THE WITNESS: I can't, again, speak
11 to Mr. Schwartz because, as I said in the
12 beginning, I wasn't positive the extent of his
13 participation. I can't speak to Mr. Collura,
14 because any communications I had with him are
15 privileged. But for the rest of us, yes.

16 BY MR. MACGILL:

17 Q You did discuss whether there was
18 sufficient cooperation that the others of you did?

19 MR. KLEIN: You said "cooperation," I
20 assume you meant "corroboration"?

21 MR. MACGILL: Corroboration.

22 MR. KLEIN: Corroboration.

1 BY MR. MACGILL:

2 Q All right. And then with respect to
3 this issue of whether this incident was even within
4 the scope of the engagement, did -- was that also
5 discussed by each one of the four of you?

6 A Yes.

7 Q And that was Ms. Kilpatrick,
8 Mr. Holske, yourself, and your CEO, right?

9 A Yes.

10 Q And what was his specific concern
11 that was raised by your CEO about that issue as to
12 whether this allegation was even within the scope?

13 MR. KLEIN: Objection as to form.

14 You can answer.

15 THE WITNESS: It wasn't a concern, it
16 was a, "Is it within the scope?" And we went
17 through whether it was in the scope and determined
18 that it was.

19 BY MR. MACGILL:

20 Q What were the arguments against
21 concluding it was -- this allegation was within the
22 scope?

1 MR. KLEIN: Object as to form.

2 You can answer.

3 THE WITNESS: It wasn't an argument
4 for or against. It was, was it within the scope or
5 was it not, and determined that it was within the
6 scope.

7 BY MR. MACGILL:

8 Q What was said as to the issue of
9 whether it was not in the -- strike that.

10 What was said about whether you could
11 conclude that the engagement was not -- or the
12 interaction was not within the scope --

13 MR. KLEIN: Objection.

14 BY MR. MACGILL:

15 Q -- of the engagement?

16 MR. KLEIN: I'm sorry, Rob.

17 Objection as to form.

18 You can answer.

19 THE WITNESS: If you want me to be
20 that specific, I would need to see the language of
21 the engagement letter. That would be helpful for
22 right now.

1 BY MR. MACGILL:

2 Q Okay. Can you tell us without
3 looking at the engagement letter?

4 A It would be helpful if I could see
5 the language of the engagement letter to be that
6 specific.

7 Q Tell us what you can without seeing
8 the engagement letter.

9 A I need to see the engagement letter
10 to be that specific to answer your question, sir.

11 Q You cannot tell -- you can't tell us
12 anything about the objections raised about whether
13 or not this engagement -- whether or not, including
14 this interaction, was within the scope of the
15 engagement?

16 A If you would like me to give you an
17 accurate answer, which I would like since I'm under
18 oath, I would like to see the language of the
19 engagement letter.

20 Q Okay. Without the letter, you don't
21 have any memory yourself, as you sit here today, of
22 any -- any word spoken by anyone expressing doubts

1 or concerns as to whether including this
2 interaction was within the scope?

3 A As I mentioned before, there weren't
4 doubts or concerns. It was a decision whether it
5 fell within the scope or it didn't. If you would
6 like for me to try to give you more specifics of
7 that, I would like to see the language of the
8 engagement letter. That would be very helpful.
9 Thank you.

10 Q Okay. Now, so you know nothing you
11 can testify to -- you can't give us a single word
12 about that decision process on scope or no scope
13 without the engagement letter. Fair statement?

14 MR. KLEIN: Objection as to form.

15 You can answer.

16 BY MR. MACGILL:

17 Q Fair statement; you cannot give us a
18 single word about what was said about whether this
19 interaction was within the scope without reading
20 the engagement letter, right?

21 MR. KLEIN: Objection.

22 Mischaracterizes her testimony. But she can

1 answer.

2 THE WITNESS: What I said was I would
3 like to be accurate in my testimony.

4 BY MR. MACGILL:

5 Q Can you or can you not give us any
6 description of any kind without referring to a
7 document?

8 A If I can answer. What I said was I
9 would like to be accurate in my testimony since I
10 am under oath. If you would like me to be accurate
11 in my testimony, which I will because I am under
12 oath, I need to see the language of the engagement
13 letter.

14 Q Okay.

15 A If you're not going to show me that,
16 then my answer is I cannot answer that at this
17 time.

18 Q Okay. Now -- and that's what we
19 thought, ma'am. I just want the jury to hear that,
20 that you cannot -- without the crutch of an
21 engagement letter, you can't speak to this issue
22 and provide this jury or this court any guidance

1 whatsoever in terms of what was said by the four of
2 you in terms of whether to -- this interaction was
3 within the scope, right?

4 MR. KLEIN: Objection.

5 Mischaracterizes the testimony and argumentative.

6 You can answer.

7 THE WITNESS: That's correct --

8 BY MR. MACGILL:

9 Q Okay.

10 A -- I can't discuss something that's
11 happened close to two years ago, a specific
12 conversation, without looking at a sentence or two
13 from the engagement letter, that's correct.

14 Q Because remembering what happened two
15 years ago, in your case, would be difficult to
16 remember the exact details, right?

17 MR. KLEIN: You can answer.

18 THE WITNESS: Possibly.

19 BY MR. MACGILL:

20 Q Possibly.

21 Yet, you, for your part, when you
22 decided whether to include Pastor Johnny Hunt, you

1 were comfortable publishing something that occurred
2 about 12 years ago, right?

3 MR. KLEIN: Objection. Outside the
4 scope. Mischaracterizes her testimony.

5 You can answer.

6 THE WITNESS: Yes.

7 BY MR. MACGILL:

8 Q Yes.

9 And so you have doubts about
10 testifying to events two years ago for which you
11 were paid, right?

12 A I was not paid for the work.

13 Q You did your work for free?

14 A Guidepost Solutions was paid for the
15 work done for the SBC.

16 Q And they made you?

17 A I received a salary from Guidepost
18 Solutions.

19 Q And your salary, you -- your salary
20 was paid from -- at least in part by the money from
21 SBC Executive Committee, right?

22 A I have no idea.

1 MR. KLEIN: Objection.

2 THE WITNESS: I'm sorry.

3 MR. KLEIN: Objection as to form.

4 Outside the scope.

5 You can answer if you know.

6 THE WITNESS: I have no idea.

7 BY MR. MACGILL:

8 Q But you -- will you admit -- just now
9 will you admit that you billed your time and
10 charged your time for the work on this engagement?

11 A Among many other engagements.

12 Q How much were you paid per hour for
13 this engagement?

14 MR. KLEIN: Objection. Outside the
15 scope.

16 You can answer if you know.

17 THE WITNESS: I don't remember.

18 BY MR. MACGILL:

19 Q What was -- do you have -- what was
20 your hourly rate in 2022?

21 MR. KLEIN: Same objection.

22 You can answer.

1 THE WITNESS: For what types of
2 matters?

3 BY MR. MACGILL:

4 Q This type of matter.

5 A This was a different matter because
6 we had reduced rates, so that's why I'm struggling.
7 I think it was somewhere in the [REDACTED], but I'm
8 not sure.

9 Q [REDACTED] what?

10 A [REDACTED]

11 Q You were paying more than [REDACTED]
12 [REDACTED] for your work in this case?

13 A Again, I -- I -- I don't recall. I
14 can't recall.

15 Q So you --

16 A I shouldn't guess. I can't recall.

17 Q Your understanding is -- what's your
18 hourly rate today?

19 MR. KLEIN: Objection. Outside the
20 scope.

21 You can answer.

22 THE WITNESS: [REDACTED] for DEA matters.

1 BY MR. MACGILL:

2 Q And do you think that you were
3 charged -- you charged approximately [REDACTED]
4 to the SBC for your work in connection with this
5 investigation?

6 MR. KLEIN: Objection as to form.

7 You can answer.

8 THE WITNESS: Possibly.

9 BY MR. MACGILL:

10 Q Were you charging [REDACTED]
11 of your work in this engagement?

12 MR. KLEIN: Same objection. Outside
13 the scope.

14 But you can answer.

15 THE WITNESS: Matters that pertain to
16 the investigation. Administrative hours, no.

17 BY MR. MACGILL:

18 Q So you were paid more than [REDACTED]
[REDACTED] for the services that you gave in connection
20 with this engagement, and you're telling this court
21 and jury you can't remember what you did two years
22 ago when you were being paid more than [REDACTED]

1 [REDACTED]. Is that right?

2 MR. KLEIN: Objection as to form.
3 Mischaracterizes her testimony.

4 You can answer if you can.

5 THE WITNESS: I -- yeah, I -- you're
6 going to have to say that again.

7 BY MR. MACGILL:

8 Q You were paid more than [REDACTED]
9 for your work on this report for the SBC. Is that
10 right?

11 MR. KLEIN: Objection as to form.
12 Outside the scope.

13 In your personal capacity, you can
14 answer.

15 THE WITNESS: I told you that was a
16 guess, so I'm not sure. And -- yeah, that's my
17 answer, I'm not sure. And, again, I wasn't paid,
18 Guidepost Solutions was paid.

19 BY MR. MACGILL:

20 Q Okay. So let's follow the money
21 here. So you recorded your time and you understood
22 your time was being charged to the Southern Baptist

1 Convention Executive Committee at a rate of
2 approximately [REDACTED]

3 [REDACTED] for your time. Is that right?

4 MR. KLEIN: Objection. Outside the
5 scope. Mischaracterizes her testimony.

6 But you can answer.

7 THE WITNESS: I recorded my time and
8 the SBC was billed on a monthly basis.

9 BY MR. MACGILL:

10 Q Who billed them?

11 MR. KLEIN: Same objection.

12 BY MR. MACGILL:

13 Q Who did --

14 MR. KLEIN: I'm sorry, Rob.

15 BY MR. MACGILL:

16 Q Who did the billing function in this
17 engagement?

18 MR. KLEIN: Objection as to form.
19 And outside the scope.

20 You can answer.

21 THE WITNESS: I reviewed the bills.
22 They ultimately were approved by Julie Myers Wood

1 and sent out by our accounting department.

2 BY MR. MACGILL:

3 Q Did you review the bills at any time?

4 MR. KLEIN: Objection. Outside the
5 scope.

6 You can answer in your personal
7 capacity.

8 THE WITNESS: Yes, I'm sorry, I just
9 said that I recalled the bills.

10 BY MR. MACGILL:

11 Q Okay. I didn't ask a good question.

12 Did you review the bills throughout
13 the entire engagement?

14 MR. KLEIN: Same objection.

15 You can answer.

16 THE WITNESS: Yes.

17 BY MR. MACGILL:

18 Q All right. And would you approve --
19 would you edit the bills in any way? Take time
20 off, add time, those kind of things.

21 MR. KLEIN: Objection. Outside of
22 scope. And as to form.

1 You can answer.

2 THE WITNESS: I didn't have the
3 authority to do that.

4 BY MR. MACGILL:

5 Q Okay. Why would you review the bills
6 then?

7 MR. KLEIN: Same objection.

8 You can answer.

9 THE WITNESS: To clean them up.

10 BY MR. MACGILL:

11 Q When you say "clean them up," what do
12 you mean?

13 A Grammar, spelling, form, removing
14 names of survivors and other persons that we didn't
15 include in the bills, things like that.

16 Q And you don't -- and you -- you did
17 that each month during the engagement for the SBC
18 on this matter?

19 MR. KLEIN: Outside the scope
20 objection.

21 But you can answer.

22 THE WITNESS: Yes.

1 BY MR. MACGILL:

2 Q All right. Can you tell the court
3 approximately how much your company billed for the
4 services to the SBC in connection with the
5 Guidepost report?

6 MR. KLEIN: Objection. It's outside
7 the scope of the topics that we agreed to.

8 But you can answer in your personal
9 capacity.

10 MR. MACGILL: Well, you -- we've
11 agreed to nothing. You made statements -- these
12 are unilateral statements that you have not made.
13 We have not made any agreements. And we're happy
14 to discuss it. We haven't made any agreements with
15 you on this.

16 MR. KLEIN: No, I agree with you,
17 Rob. I'm saying it's outside the scope of anything
18 we have agreed to. So we haven't agreed to it,
19 that's the point.

20 MR. MACGILL: It's fair --

21 MR. KLEIN: That's my point.

22 MR. MACGILL: -- and these are

1 unilateral, and that's all I wanted to make clear.

2 BY MR. MACGILL:

3 Q Answer the question, if you would.

4 A How much total was billed?

5 Q Yes, ma'am.

6 A I don't know.

7 Q Can you estimate it?

8 MR. KLEIN: Same objection.

9 You can answer.

10 THE WITNESS: We discounted it in the
11 end significantly. I think total -- I can't say
12 total billed, I think total paid was approximately

13 [REDACTED]

14 BY MR. MACGILL:

15 Q And total billed was over [REDACTED]

16 A No.

17 MR. KLEIN: Objection.

18 THE WITNESS: Because we didn't bill
19 it, we discounted it.

20 BY MR. MACGILL:

21 Q Okay. Now, so money flow was such
22 that your salary was paid by Guidepost, right?

1 A Yes.

2 Q Okay. You understood that you were
3 being compensated for the work you did on this
4 engagement, right?

5 MR. KLEIN: Objection as to form --
6 I'm sorry, objection. Outside the scope.

7 You can answer in your personal
8 capacity.

9 THE WITNESS: I was being compensated
10 for my total work at Guidepost --

11 BY MR. MACGILL:

12 Q Which --

13 A -- part of which was this engagement.

14 Q And what percentage of your time
15 during the year 2022 was this engagement?

16 MR. KLEIN: Objection. Outside the
17 scope.

18 You can answer.

19 THE WITNESS: For 2022, this
20 engagement was probably 25 percent.

21 BY MR. MACGILL:

22 Q And 25 percent would represent how

1 many hours approximately?

2 A I have no idea.

3 Q How many hours do you bill in a year?

4 MR. KLEIN: Objection. Outside the
5 scope.

6 You can answer.

7 BY MR. MACGILL:

8 Q How many hours did you bill
9 approximately in the year 2022?

10 MR. KLEIN: Objection. Outside the
11 scope.

12 But you can answer in your personal
13 capacity.

14 THE WITNESS: I don't know.

15 BY MR. MACGILL:

16 Q Can you estimate it?

17 A Twelve to 1,300.

18 Q 1,200 to 1,300.

19 A Yes.

20 Q Okay. And would the same be true
21 approximately in the year 2023?

22 MR. KLEIN: Objection. Outside the

1 scope.

2 You can answer if you know.

3 THE WITNESS: No.

4 BY MR. MACGILL:

5 Q More or less?

6 A Much less.

7 Q Because you have an administrative
8 role now, right?

9 A No. Because we're not doing the
10 investigation.

11 Q No, I'm talking about overall.

12 A Oh, I'm sorry.

13 For my hours?

14 Q Yeah.

15 A Oh, yes, the same.

16 Q So total hours in 2023 would be
17 approximately 1,200 to 1,300 billable hours for the
18 year?

19 A Yes.

20 Q In 2022, you estimate that your 2022
21 billable hours were in the range of approximately
22 1,200 to 1,300 billable hours, right?

1 MR. KLEIN: Objection. Asked and
2 answered. And outside the scope.

3 But you can answer.

4 THE WITNESS: Uh-huh. Yes.

5 BY MR. MACGILL:

6 Q Yes.

7 And so by using the math that you
8 gave us from, you spent approximately 25 percent of
9 your work year in 2022 on the Guidepost matter,
10 that would be 300 to 325 hours. Is that right?

11 MR. KLEIN: Objection. Outside the
12 scope.

13 You can answer.

14 THE WITNESS: I'm not going to do the
15 math in my head. If that's the math, that's the
16 math.

17 BY MR. MACGILL:

18 Q Okay. I'll represent to you that
19 one-fourth of 1,200 is 300. And --

20 MR. KLEIN: I will stipulate to that.

21 BY MR. MACGILL:

22 Q -- and one-fourth of 1,300 is 325.

1 Does that sound about right in terms of your --

2 A Sure. If my counsel stipulates to
3 it, yes.

4 Q All right. And in 20 -- going back a
5 year, in 2021, can you estimate for the court how
6 much time you spent on the Guidepost engagement?

7 MR. KLEIN: Objection. Outside the
8 scope.

9 You can answer.

10 THE WITNESS: I'd say probably about
11 the same.

12 BY MR. MACGILL:

13 Q About 25 percent of your work a year?

14 A Yes.

15 Q Approximately?

16 A Yes.

17 Q All right. So during the 2020, one
18 year, if the math is -- if 25 percent is --
19 25 percent of 1,200 would be approximately 300 and
20 25 percent of 1,300 would be approximately 325
21 hours that you spent on the Guidepost matter in
22 that year of 2021. Fair?

1 MR. KLEIN: Objection. Outside the
2 scope.

3 THE WITNESS: As general estimates,
4 yes.

5 BY MR. MACGILL:

6 Q Now, switching topics. On the
7 committee -- there was a Committee on Cooperation
8 that you interacted with. Is that fair, in terms
9 of your engagement?

10 A Yes.

11 Q And who did you engage with
12 specifically?

13 Do you recall a gentleman's name?

14 A Josh, something with a "W." West --
15 Wester.

16 Q Okay. And did you also interact with
17 an SBC Task Force?

18 A Yes, but Julie did the most -- most
19 of the interacting with them.

20 Q Do you remember --

21 A Ms. Myers Wood. Excuse me.

22 Q Do you remember that Julie Myers Wood

1 had made -- had written the Sexual Abuse Task Force
2 in late April 2022, providing some draft materials
3 from Guidepost?

4 Do you remember that?

5 A Can you be more specific in terms of
6 draft materials?

7 Q Do you remember that -- that your
8 company had agreed to give a copy of the actual
9 portion of the report to the Committee on
10 Cooperation for a factual review of five days prior
11 to the submission of the Task Force?

12 Do you remember that?

13 A Yes. Pursuant to the engagement
14 letter.

15 Q Okay. Let's go to the next exhibit.
16 And this exhibit will be Exhibit 107. If you would
17 click on this.

18 (Tongring Deposition Exhibit Number 107
19 marked for identification.)

20 THE WITNESS: Okay.

21 BY MR. MACGILL:

22 Q And do you see that this -- this is a

1 memorandum to the Sexual Abuse Task Force that was
2 from Ms. Wood and from you on April 26th?

3 A I see it.

4 Q Did you approve this memorandum
5 before the -- before it was sent?

6 MR. KLEIN: Are you asking in her
7 personal capacity, Rob, at this moment that
8 question?

9 MR. MACGILL: Yes.

10 MR. KLEIN: You can answer in that
11 capacity.

12 THE WITNESS: It would have been
13 approved by Ms. Myers Wood, but I drafted it.

14 BY MR. MACGILL:

15 Q Okay. And there is a suggested
16 protocol on page -- the bottom of this first page.
17 Do you see that?

18 A Let me --

19 Q It begins, "Below is a suggested
20 protocol" --

21 A No, I know where it is, I just need
22 to make the page smaller so I can see it.

1 Q Okay.

2 A I see.

3 Q All right. And this is a -- as you
4 said, Exhibit 107 is a document that you authored?

5 A I drafted it, yes.

6 Q And you drafted it. Is that
7 different than authored?

8 Did you write this memorandum?

9 A Yeah.

10 Q Okay. And did -- after you wrote
11 this memorandum, was it sent to the Sexual Abuse
12 Task Force?

13 A Yes.

14 Q And was it sent on April 26th, 2022?

15 A I would need to see the e-mail, but
16 on or about that date, yes.

17 Q Okay. Now, it says here in your
18 Exhibit 107, "The CoC will only be able to review
19 the report in a designated room with either a task
20 force member or Guidepost representative (monitor
21 present at all times)."

22 Was that the protocol that you --

1 part of the protocol that you wrote?

2 A I wrote that, yes.

3 Q And you also say here, is Bullet
4 Point 4, "If notes are taken by the CoC, the notes
5 must be handwritten and will be collected by the
6 monitor at the end of each review date."

7 Do you see that?

8 A I do.

9 Q You included that?

10 A I wrote that.

11 Q And you also wrote, "The notes will
12 be destroyed at the conclusion of the review,"
13 right?

14 A I wrote that.

15 Q And then you also wrote, "Guidepost's
16 personnel will meet with the CoC at the conclusion
17 of their review to discuss any factual issues they
18 may have with the report."

19 You include that as part of the
20 protocol?

21 A I wrote that.

22 Q Continuing, you wrote also, "The --

1 the Guidepost will discuss suggested language or
2 changes with the CoC. Guidepost will not comment
3 to any language changes during this meeting."

4 Do you see that?

5 A I do.

6 Q And you wrote that?

7 A Yes.

8 Q And that -- these all were -- these
9 were each portions of the protocol that you wrote
10 in this memorandum, Exhibit 107?

11 A Yes.

12 Q And does this, Ma'am, accurately
13 describe the review process for the draft report?

14 A For the factual portion of the draft
15 report, yes.

16 Q Now, I want to pause here, Ma'am, and
17 make sure we're clear about some things.

18 A Uh-huh.

19 Q Pastor Johnny Hunt was not included,
20 to repeat not included, in the version of the
21 report that was shared with the Committee on
22 corp -- Cooperation, was he?

1 A On -- on date that they reviewed it,
2 on May -- or, sorry. There were two separate
3 reviews that the Committee on Cooperation did; the
4 one that is being referred to here, their in-person
5 review, no.

6 Q Okay. Let's make sure we
7 understand --

8 A Sure.

9 Q -- what your answer "no" means. It's
10 a fact, is it not, that Pastor Johnny Hunt was not
11 included, to repeat not included, in the version of
12 the report that was shared with the CoC here by
13 this memorandum, right?

14 A I'm sorry. I can't agree to that
15 it -- because it's not completely correct.

16 Q Tell us -- all right. Was Johnny
17 Hunt -- was Pastor Johnny Hunt included in the
18 version of the report that was shared with the CoC?

19 A Yes.

20 Q When?

21 A I don't recall the date. It was
22 after -- there were two -- if I can explain so that

1 we can be completely accurate. There were two
2 times that the CoC reviewed factual portions. The
3 first time was the -- the majority of the factual
4 portions of the report that were ready for review.
5 And it was an in-person review with most of the CoC
6 with the exception of one person, and it occurred
7 in Nashville, Tennessee. And that's why all of
8 these protocols were in place because they were
9 reviewing a hard copy.

10 And there were two portions that
11 weren't included. One was the portion that -- with
12 the factual portions that pertain to your client
13 and the second was an executive -- factual portions
14 about in an executive summary.

15 Those, because they were not prepared
16 yet and were not going to be -- were not ready for
17 inclusion into the report, obviously were not shown
18 to the CoC at that time. At a later time they were
19 shown via Zoom or Teams or some other virtual
20 setting to the CoC.

21 Q And the first time, that is as of
22 this memorandum that you wrote on April 26th, 2022,

1 Pastor Johnny Hunt was not included in this
2 version, that is Exhibit 107?

3 MR. KLEIN: Objection as to form.

4 You can answer if you can.

5 THE WITNESS: The paper version
6 that's being referred to in this memo, no. Your
7 client's factual portion was not included in this
8 paper version, that is correct.

9 BY MR. MACGILL:

10 Q And when was this paper version
11 provided?

12 MR. KLEIN: Objection. Asked and
13 answered.

14 You can answer.

15 THE WITNESS: Unless it's included in
16 here, I don't recall the specific date.

17 BY MR. MACGILL:

18 Q Okay. Ma'am, you now have on your
19 computer screen, Exhibit 66. Is this the paper
20 version that was provided to the Committee on
21 Cooperation, which did not include reference to
22 Pastor Johnny Hunt?

1 A It hasn't appeared yet. Give me a
2 minute, please.

3 MR. KLEIN: Is it there yet?

4 THE WITNESS: No. It's --

5 MR. KLEIN: Well, click -- do me a
6 favor, click in that area.

7 THE WITNESS: Oh, okay.

8 MR. KLEIN: Maybe the --

9 THE WITNESS: Okay. The number just
10 didn't show up. Thank you.

11 MR. KLEIN: The same thing happened
12 to us.

13 THE WITNESS: Okay. Yeah.

14 BY MR. MACGILL:

15 Q This is the paper version?

16 A An electronic copy of it, yes.

17 Q Okay. And so this -- you can confirm
18 now that you've seen Exhibit 66, that this is the
19 paper version that was provided to the committee on
20 the -- Committee on Cooperation that did not
21 include Pastor Johnny Hunt-related issues?

22 A Correct.

1 Q Now, if you go to page 112 -- well,
2 let me ask -- let me ask one other question first.

3 Julie Myers Wood testified in this
4 case that the members of the CoC had invited two or
5 more individuals to review the report before
6 publication. Can you tell the court who those
7 individuals were?

8 MR. KLEIN: Objection as to form.

9 You can answer.

10 THE WITNESS: Okay. I don't know.

11 BY MR. MACGILL:

12 Q You don't know?

13 A I don't remember.

14 Q Do you recall that they did, in fact,
15 invite two other people to make a review?

16 A It sounds somewhat familiar, but I --
17 I don't recall the specifics. I'm sorry.

18 Q Turn to page 112, if you would.

19 A Okay.

20 Q And you'll see there's a heading next
21 to Roman Numeral 5 that's been redacted. Can you
22 tell us about this redaction?

1 A No.

2 Q Do you know what the heading says?

3 A No.

4 Q So, Ma'am, I'll represent to you that
5 the extracted text provided to us in discovery
6 says, quote --

7 MR. KLEIN: Hold on a second, Rob.
8 This is attorneys' eyes only, this document, so
9 especially if you're going to read from a redacted
10 portion of an attorneys' eyes only document, I
11 would ask either that you not do that or you have
12 your client in a separate Zoom room.

13 MR. MACGILL: All right. Would you
14 text Pastor Johnny Hunt and ask him to just step
15 out?

16 Okay.

17 VIDEOGRAPHER: I can put him in a
18 room.

19 MR. KLEIN: Yeah --

20 MR. MACGILL: Okay. Great.

21 MR. KLEIN: -- if you can do that,
22 that would be great.

1 He's in there? Great.

2 BY MR. MACGILL:

3 Q All right. I'll represent to you
4 that the extracted text provided to us in discovery
5 says, quote, Observations and Conclusions.

6 Does that refresh your memory on what
7 was involved here?

8 A Oh, right, yes. And we would have
9 redacted that. Uh-huh.

10 Q All right. And did you also redact,
11 "Allegations of abuse committed by Executive
12 Committee members"?

13 A If that's what it says, yeah.

14 Q So, Ma'am, look at the third
15 redaction, and I'm going to read it to you. Do you
16 see the first two -- the first line is
17 "Observations and conclusions"?

18 A Uh-huh.

19 Q I think we agreed on that.

20 The second redaction is, "Allegations
21 of abuse committed by Executive Committee members."

22 A Uh-huh.

1 Q Do we agree on that?

2 MR. KLEIN: Well, objection. We're
3 not seeing an un-redacted form. I'm accepting your
4 representation, Rob, but just so the record is
5 clear, we don't see the un-redacted version --

6 MR. MACGILL: Right.

7 MR. KLEIN: -- but I accept your
8 representation.

9 MR. MACGILL: Right, that's --

10 THE WITNESS: It would maybe --

11 BY MR. MACGILL:

12 Q -- that's true? I mean yes?

13 A It makes sense. It was the first
14 bullet point.

15 Q All right. And then also redacted
16 here is the language, "This is from Messenger's
17 Motion-Investigation so far has not revealed any
18 allegations of abuse committed directly by EC
19 members during the time period."

20 Do you see that?

21 A I -- I don't see it because it's
22 redacted.

1 Q Yeah. I will represent --

2 MR. MACGILL: And now I'm going to
3 ask Counsel to represent that that is true. I'll
4 read it again.

5 MR. KLEIN: Well, I'll tell you, I
6 cannot represent because I don't have an
7 un-redacted version in front of me, but I am
8 accepting your representations, Rob, if that's what
9 you say it says, as an officer of the court, I
10 accept your representation. I don't have an
11 un-redacted version in front of me, so I cannot
12 confirm that.

13 BY MR. MACGILL:

14 Q Okay. Counsel -- strike that.

15 You heard what Counsel said. I'm
16 going to read it to you again.

17 A Okay.

18 Q Quote, This is from the Messenger's
19 Motion-Investigation so far has not revealed any
20 allegations of abuse committed directly by EC
21 members during the time period.

22 Do you recall that being written in

1 the report?

2 A It wouldn't surprise me.

3 Q And do you recall those specific
4 words being written and included in the paper copy
5 that was given to the Committee on Cooperation?

6 A If it's redacted here, it wouldn't
7 surprise me that that was in a draft of our report.

8 Q One last question on this topic.
9 Would you -- can you admit now, based on looking at
10 this particular report, once again, that as of
11 April 20 -- as of April 26th, 2022, that the
12 Guidepost investigation, quote, So far has not
13 revealed any allegations of abuse committed
14 directly by EC members during the time period?

15 A No.

16 Q Okay. Why is -- why do you not agree
17 with that?

18 A Because this was a draft of the
19 report that was being drafted by other people in
20 a -- who were in the investigation. Not everyone
21 knew what was happening in the -- in your client's
22 investigation. This was a placeholder. That was

1 probably there for quite some time.

2 Q Go back to page 1 of Exhibit 107,
3 your memorandum. If you would go back to Exhibit
4 107, page 1, please.

5 A Okay.

6 MR. KLEIN: Are you there?

7 THE WITNESS: I'm there.

8 MR. KLEIN: Okay.

9 BY MR. MACGILL:

10 Q Under Roman 2 you wrote the following
11 sentence, "A copy of the factual portion of the
12 report must be provided to the Committee on
13 Cooperation for a factual review five days prior to
14 submission to the Task Force, May 10, 2022."

15 Those are your words, right?

16 A Yes.

17 Q Does that tell you -- when was it
18 that you delivered the paper copy to the Committee
19 on Cooperation?

20 A I don't know.

21 Q Was it May 10, 2022?

22 A I don't know.

1 Q Now, I'm going to ask you the same
2 question on this redaction. I want you to go back
3 to the third redaction on page 113 of 155 of this
4 draft report. As of May 10, 2022, is it true that
5 your company had written in this paper copy of the
6 report, quote, This is from the Messenger's
7 Motion-Investigation so far has not revealed any
8 allegations of abuse committed directly by EC
9 members during the time period.

10 Do you see admit that that was stated
11 in this draft of May 10, 2022?

12 MR. KLEIN: For the record, again,
13 you -- I believe, Rob, you're reading from the
14 un-redacted portion of this document. We cannot
15 see what you're reading. I will accept your
16 representation as an officer of the court that
17 you're reading it accurately, but just for the
18 record, we cannot confirm that's what it says, but
19 with that assumption, Rob, feel free to ask your
20 question to the witness.

21 BY MR. MACGILL:

22 Q Please answer.

1 A If that's what you're saying it says,
2 then yes, that's what --

3 Q It was true?

4 A No.

5 Q As of May 10th, it was true?

6 A No, it's not true.

7 Q Okay. So in the -- what you gave the
8 Committee on Cooperation, you misled the committee
9 when you said -- when you specifically represented
10 in writing -- you misrepresented the reality of --
11 of the investigation as of that time, because what
12 you wrote to the committee is, "This is from the
13 Messenger's Motion-Investigation so far has not
14 revealed any allegations of abuse committed
15 directly by EC members during the time period."

16 A That --

17 MR. KLEIN: Objection.
18 Mischaracterizes the testimony and states facts not
19 in evidence that this un-redacted version went to
20 the committee.

21 Having said that, you can answer if
22 you can.

1 THE WITNESS: That -- the statement
2 that you are reading was not sent to the -- was not
3 provided to the Committee on Cooperation. The
4 Committee on Cooperation received a redacted
5 version where observations and anything else that
6 is on that page 113 was redacted so they didn't get
7 to see that. They only saw any factual portions.
8 So that representation, that language that you're
9 reading there was not seen by the Committee on
10 Cooperation.

11 BY MR. MACGILL:

12 Q But you wrote the memo, Exhibit 107,
13 why didn't you tell them in the memo the Sexual
14 Abuse Task Force, why didn't you give them the
15 truth of the matter at that time?

16 In the memorandum that you wrote you
17 did not tell them, "Investigation so far has not
18 revealed any allegations of abuse committed
19 directly by EC members during the time period"?

20 MR. KLEIN: Objection as to form.

21 BY MR. MACGILL:

22 Q Tell the Court --

1 MR. KLEIN: You may answer.

2 BY MR. MACGILL:

3 Q Tell the Court why you didn't include
4 that fact in your memorandum, Exhibit 107.

5 MR. KLEIN: Objection as to form.

6 You can answer.

7 THE WITNESS: They were only seeing
8 factual portions of the report. That was not a
9 factual portion of the report, that was an internal
10 notation of the company. And that was factually
11 inaccurate at the time.

12 BY MR. MACGILL:

13 Q So --

14 A And it was redacted for them to not
15 see.

16 Q Okay. Now, so it was not true --
17 when somebody -- so strike that.

18 So someone -- the drafter of this
19 report, who drafted the language, which included
20 the exact words, "Investigation so far has not
21 revealed any allegations of abuse committed
22 directly by EC members during the time period"?

1 A I don't know.

2 Q Did you see that with your own eyes
3 at any time?

4 A I don't recall.

5 Q Okay. Who did this redaction?

6 A I don't know.

7 Q Did you?

8 A Probably not because I'm not really
9 great with redactions.

10 Q Okay. Ma'am, as of May 10, 2020, why
11 are you holding back observations and conclusions
12 from the CoC --

13 A Because --

14 MR. KLEIN: Objection.

15 BY MR. MACGILL:

16 Q -- of a copy?

17 MR. KLEIN: Objection as to form.

18 You can answer.

19 THE WITNESS: Because pursuant to our
20 engagement letter, they are not permitted to see
21 our observations, they only were allowed to see
22 factual information.

1 BY MR. MACGILL:

2 Q Well, you say in the first portion
3 you didn't redact, "While President and CEO of the
4 Executive Committee 2010 to 2018, Paige maintained
5 an inappropriate relationship with a female from a
6 church where he had been an interim pastor."

7 That was a factual statement, was it
8 not?

9 A Exactly.

10 Q Yeah.

11 A They're permitted to see factual
12 information, they're not permitted to see
13 observations or conclusions.

14 Q Okay. And you had no -- you had no
15 factual observations as of May 10, 2022, which
16 revealed any allegations of abuse committed
17 directly by EC members during the time period?

18 MR. KLEIN: Objection as to form.

19 You can answer.

20 THE WITNESS: We had none that were
21 definitively going into the report. We had some.
22 We were still determining whether they were going

1 into the report, so, of course, we were not going
2 to share those with anyone outside of our
3 investigative team.

4 BY MR. MACGILL:

5 Q So the first -- when was it the
6 first -- when was it that you provided by Zoom or
7 Teams meeting the portion to the CoC the portion --
8 or the report that included Pastor Johnny Hunt?

9 A So I do know that date because I was
10 looking for -- I was looking at that, May 13th. It
11 was Friday the 13th.

12 Q And when was the report published?

13 A I do not know when the Task Force
14 published the report, but we provided them with the
15 report either the 15th or the 16th on e-mail.

16 Q When did Guidepost post the report on
17 its website?

18 A We did not provide --

19 MR. KLEIN: Objection as to form.

20 THE WITNESS: I'm sorry.

21 MR. KLEIN: You can answer.

22 THE WITNESS: We did not post the

1 report on our website.

2 BY MR. MACGILL:

3 Q Did you make any reference to the
4 report on your website?

5 A We put a link to the Task Force --
6 excuse me, Task Force's website through a link on
7 our website.

8 Q So one going to your website would
9 see a link that they could click on that would take
10 them to the Guidepost report. Is that right?

11 A No, that's not correct. There was a
12 button that said, "SBC EC Investigation." And then
13 they would click on that and they would see a page.
14 And there were some details about either the
15 investigation -- the whole time there were details
16 about the investigation. At the conclusion of the
17 investigation, there were some details about the
18 hotline. And then there was a web link to the Task
19 Force, which then took you to the Task Force
20 website. And then you could go through there and
21 then you had to click on something to get to the
22 actual report.

1 Q Okay. So somebody could, by
2 navigating your website, see the full report of
3 Guidepost?

4 MR. KLEIN: Objection.
5 Mischaracterizes her statement.

6 You can answer.

7 THE WITNESS: By clicking several
8 links, they could find the report, that's correct.

9 BY MR. MACGILL:

10 Q And that was the purpose, that you
11 wanted people to be able to see the Guidepost
12 report by navigating through your website, right?

13 A No, that was not the purpose.

14 Q Okay. How many people view the
15 report through access to your -- through your
16 website?

17 MR. KLEIN: Objection as to form.
18 Outside the scope.

19 You can answer if you can.

20 THE WITNESS: I don't know.

21 BY MR. MACGILL:

22 Q Have you ever looked at that?

1 A I don't know that we have the
2 capability. But to answer your question, no, I
3 have not looked at that.

4 Q Now, so the Committee on Cooperation
5 was given the updated report on May 13, 2022?

6 A It wasn't an updated report, it was
7 portions -- portions -- excuse me, factual sections
8 that they had not seen before.

9 Q So on May 13th, 2022, you included
10 reference to Pastor Johnny Hunt on the allegations
11 of the [REDACTED]

12 A Yes.

13 Q Tell this court and tell this jury
14 how many days after you interviewed Johnny Hunt
15 that that edited report was produced.

16 MR. KLEIN: Objection. Outside the
17 scope.

18 You can answer.

19 THE WITNESS: I would need to go back
20 to the exhibit to see when that second interview
21 was.

22

1 BY MR. MACGILL:

2 Q Do you have any sense of it?

3 A No.

4 Q You don't remember that you
5 published -- you added to the Guidepost -- you
6 added Pastor -- strike that.

7 You don't recall, Ma'am, that you
8 added reference to Pastor Johnny Hunt one day after
9 interviewing him about the [REDACTED] interaction?

10 MR. KLEIN: Objection as to form.

11 You can answer.

12 THE WITNESS: No, I don't.

13 BY MR. MACGILL:

14 Q No, you don't recall any of that?

15 A I just said I didn't.

16 Q You don't recall any of your own
17 participations on May 12th and 13th about the
18 Pastor Johnny Hunt's inclusion in the report?

19 MR. KLEIN: Objection.

20 Mischaracterizes her statement.

21 You can -- you can answer.

22 THE WITNESS: I didn't interview him,

1 but I just said I didn't recall the time.

2 BY MR. MACGILL:

3 Q You didn't look at any documents in
4 your preparation for this deposition to see what it
5 was that you were doing on May 12th and May 13th,
6 to determine what your role was in including Pastor
7 Johnny Hunt in the report issued by Guidepost one
8 day after his interview?

9 A I looked to see when we showed the
10 factual portion to the Committee on Cooperation.
11 Those were the documents that I looked at.

12 Q All right. And what was that date?

13 A May 13.

14 Q May 13th, 2022, right?

15 A (Moving head up and down.)

16 Q And when was the interview of Pastor
17 Johnny Hunt?

18 MR. KLEIN: Objection. Asked and
19 answered.

20 THE WITNESS: I --

21 MR. KLEIN: You can answer again.

22 THE WITNESS: I just said I didn't

1 remember, but I think you just said it was
2 May 12th.

3 BY MR. MACGILL:

4 Q All right. Well, I -- I was just
5 trying to refresh your memory.

6 A Okay.

7 Q Right now let's make sure we can get
8 the truth of it from you here.

9 A Great.

10 Q Okay. Let's go back to
11 interrogatories. All right. Let's look together
12 at Interrogatory 1. And what I'd like you to do --
13 I'm sorry, Interrogatory 2, and this is page 4 of
14 8. "Would you please indicate when it was that
15 Pastor Johnny Hunt was interviewed."

16 MR. OTCHY: He's on Document 3.

17 MR. KLEIN: Yeah, sorry, I should
18 have helped you there.

19 THE WITNESS: Yeah, May 12.

20 BY MR. MACGILL:

21 Q So the interview of Pastor Johnny
22 Hunt on the issues associated with the allegations

1 of the [REDACTED] was on May 12th. What year?

2 A 2022.

3 Q And tell the court and jury when it
4 is you published for the first time a report which
5 included the name of Pastor Johnny Hunt.

6 MR. KLEIN: Objection as to form.
7 Mischaracterizes her statement.

8 You can answer.

9 THE WITNESS: We showed factual
10 portions of the report that contained reference to
11 that in a confidential Zoom call to the Committee
12 on Cooperation on May 13th.

13 BY MR. MACGILL:

14 Q So it was just one day after your one
15 and only interview of Pastor Johnny Hunt pertaining
16 to the [REDACTED] allegations that you included him in
17 the draft that was given to the Cooperation
18 Committee, right?

19 A Correct.

20 Q Now, as just an ordinary citizen or
21 trained lawyer or just a -- someone interested in
22 being independent and fair in a report, do you

1 think that's a good protocol in terms of naming an
2 object of allegations of sexual abuse, that is to
3 have this turned around on a one-day period of
4 time?

5 MR. KLEIN: Objection. This is a
6 30(b)(6) deposition, it's not about her personal
7 views, but I'm not going to direct her not to
8 answer. I will allow her to answer in her personal
9 capacity, but a reminder you're going to be
10 deposing her in her individual capacity tomorrow.

11 But you can answer.

12 THE WITNESS: I stand by our process.

13 BY MR. MACGILL:

14 Q How about that process, Ma'am, on the
15 day that you wrote this report including Pastor
16 Johnny Hunt on May 13th, your team went back to the
17 [REDACTED] on that same day, didn't they?

18 A I see that on the interrogatories,
19 yes.

20 Q Why in the world does an independent
21 investigator interview Pastor Johnny Hunt on
22 May 12th and then go back to the [REDACTED] on

1 May 13th?

2 MR. KLEIN: Objection as to form.

3 Argumentative.

4 You can answer in your personal
5 capacity. It's beyond the scope of the 30(b)(6),
6 but you can answer.

7 THE WITNESS: I don't recall.

8 BY MR. MACGILL:

9 Q Did that raise any concerns to you as
10 somebody that was participating in what was billed
11 to be a, quote, unquote, investigation?

12 MR. KLEIN: Objection. Beyond the
13 scope.

14 You can answer.

15 THE WITNESS: In my personal
16 capacity, I said that I didn't recall, I didn't say
17 it didn't concern me.

18 BY MR. MACGILL:

19 Q Look at Exhibit 18, Ma'am --

20 A 18.

21 Q -- if you would, please.

22 A 18?

1 Q Yeah.

2 A Is that a new one?

3 MR. KLEIN: Yeah, I don't see 18
4 shown to her yet. Is that a new one, Patrick?

5 MR. SANDERS: One second. Okay. You
6 should see it, Document 8.

7 THE WITNESS: 8. Okay. Thank you.

8 BY MR. MACGILL:

9 Q All right. Ma'am, you were to -- the
10 Guidepost engagement was to write an independent
11 third-party report. Is that right?

12 A Yes.

13 Q And looking at Exhibit 18 --

14 MR. KLEIN: Rob, I would note -- I'm
15 sorry to interrupt you. I would note that this is
16 also marked attorneys' eyes only, so if you're
17 going to quote from it, I would ask that your
18 client be placed into a separate Zoom room. If
19 you're going to ask general questions about it, but
20 if you're going to quote from it, I would ask that
21 that occur.

22 VIDEOGRAPHER: Okay.

1 MR. MACGILL: Please go ahead and do
2 that.


3 BY MR. MACGILL:

4 Q Ma'am, it says right here this is a
5 text on May 12th, the day we've been focusing on,
6 the day of the interviews. This is from
7 Ms. Kilpatrick, isn't it?

8 A That's --

9 Q Mr. -- and I'm sorry, this is from
10 Mr. Holske to Samantha Kilpatrick, isn't it?

11 A I don't see Mr. Holske on there.

12 Q The jury will hear, Ma'am, by the
13 time your testimony is played, that that is exactly
14 what this is. This is a text stream between
15 Mr. Holske and Ms. Kilpatrick. And Mr. Holske
16 writes on May 12th at -- 2022, at 15:25, "I feel
17 like even after edits, it's still missing the
18 

19 Do you see that?

20 A I --

21 MR. KLEIN: Objection as to form.

22 You can answer.

1 THE WITNESS: I see it.

2 BY MR. MACGILL:

3 Q Is that what your company was about
4 here, Ma'am, and that is creating, quote, [REDACTED]
5 unquote?

6 MR. KLEIN: Objection as to form.
7 Compound.

8 You can answer.

9 THE WITNESS: That was -- the report
10 was an independent investigation, it was about
11 reporting the facts.

12 BY MR. MACGILL:

13 Q But not [REDACTED] Ma'am, isn't this
14 about facts and being independent rather than doing
15 something to create quote, [REDACTED] unquote?

16 MR. KLEIN: Objection. Just asked
17 and answered. She can answer again.

18 THE WITNESS: I stand by my first
19 answer.

20 BY MR. MACGILL:

21 Q So, you know, have you seen this text
22 before, Ma'am?

1 A Maybe.

2 Q Doesn't this raise some concerns to
3 you about what you and those acting in concert with
4 you were doing on May 12th, that is looking to
5 create quote, [REDACTED] unquote?

6 A No. Reading the version of the --
7 the whole text, it doesn't.

8 Q Okay. Now, looking at the -- what
9 the Committee on Cooperation was provided on
10 May 13, let's look at the next exhibit.

11 Ma'am, we've got Exhibit 108 in front
12 of you.

13 A Yeah.

14 (Tongring Deposition Exhibit Number 108
15 marked for identification.)

16 BY MR. MACGILL:

17 Q Is this an e-mail that was sent on
18 May 12th at 6:40 p.m.?

19 A Yes.

20 Q And this was from Joshua Wester to
21 Nancy Spalding?

22 A Yes. I --

1 MR. KLEIN: Objection. The document
2 speaks for itself.

3 But you can answer if you can.

4 And I would note that it looks like
5 Ms. Spalding is a bcc, for the record, as I'm
6 reading the document.

7 BY MR. MACGILL:

8 Q Who is Joshua Wester?

9 A Josh Wester was who I was speaking
10 about earlier. He's sort of a go-between for the
11 CoC. He was Ed Litton's assistance. Ed Litton was
12 one of the CoC people.

13 Q We'll go to the next exhibit.

14 MR. KLEIN: You don't have it yet.
15 It's coming.

16 THE WITNESS: Okay.

17 MR. SANDERS: It will be Document 10
18 on your screen.

19 THE WITNESS: Oh, okay. Thank you.

20 BY MR. MACGILL:

21 Q Exhibit 67. Is Exhibit 67 the report
22 that was given to the Committee on Cooperation on

1 May 13th, 2022?

2 MR. MACGILL: You can take Johnny
3 back in.

4 MR. KLEIN: Hold on.

5 You can, yes. I'm sorry. Thank
6 you, Rob.

7 THE WITNESS: It wasn't given to
8 them, but this is what they were shown on the
9 screen via Zoom or Teams, or whatever it was that
10 we used. I don't recall.

11 BY MR. MACGILL:

12 Q And this -- this is -- what is shown
13 by Zoom or on Teams, this is the report you
14 described earlier that for the first time on
15 May 13, 2022, there is reference to the allegations
16 made as against Pastor Johnny Hunt?

17 A The first time that they are seeing
18 it, yeah.

19 Q Let's go to the next exhibit.
20 (Tongring Deposition Exhibit Number 109
21 marked for identification.)
22

1 BY MR. MACGILL:

2 Q Exhibit 109.

3 A Wait. Sorry. I just messed
4 something up. Hold on.

5 MR. KLEIN: Do you need assistance?

6 THE WITNESS: I think I got it.
7 Yeah. No, I'm okay. Okay.

8 BY MR. MACGILL:

9 Q Okay. Now, do you see that -- you
10 see that you're included on this e-mail chain?

11 A I see that, yes.

12 Q And that you wanted to discuss
13 certain comments?

14 A I need to go to the bottom.

15 Q Okay.

16 A Oh, wait. Yes, I see that.

17 Q All right. And if you go to the page
18 number 13492. Tell me when you're on that page.

19 MR. KLEIN: Those are the Bates
20 stamps.

21 THE WITNESS: Yep.

22 MR. KLEIN: You know they're down on

1 the bottom right?

2 THE WITNESS: Yeah. Okay.

3 BY MR. MACGILL:

4 Q And there is a reference "We were
5 asked" that I want to ask you about. At the top,
6 "As per the motion" --

7 MR. KLEIN: Hold on. She just said
8 she's --

9 THE WITNESS: I'm not there yet.

10 MR. KLEIN: -- not there yet.

11 BY MR. MACGILL:

12 Q That's what -- I'm trying to get you
13 there. Are you on that page?

14 MR. KLEIN: Yeah. The problem is
15 it's very slow.

16 BY MR. MACGILL:

17 Q It's page 3 of 14.

18 A Okay.

19 MR. KLEIN: She's there --

20 THE WITNESS: Just --

21 MR. KLEIN: -- the problem is, is
22 that it's very -- the print is very small on her

1 screen, so just give her two seconds, Rob, just to
2 make sure she gets it so she can read what you're
3 reading. She's on the page, but it's very small.

4 MR. SANDERS: There's a Zoom button
5 that you can --

6 THE WITNESS: Yeah, I --

7 MR. KLEIN: She's finding it now.
8 Great.

9 THE WITNESS: Okay.

10 MR. KLEIN: Thank you, Patrick.

11 THE WITNESS: Go ahead.

12 BY MR. MACGILL:

13 Q "As per the motion we were asked to
14 examine allegations of abuse against EC members
15 during the relevant time period."

16 Do you see that?

17 A I do.

18 Q And who wrote those words?

19 A I don't know.

20 Q And there's a comment at the right
21 margin. Is this your comment?

22 A Yes.

1 Q And what did -- please read out loud
2 your comment.

3 A It says, "Explain why - immediate
4 past president - groomed during SBC EC member as
5 president."

6 Q Okay. And --

7 A "Pastor at FBC Woodstock - hopequest
8 there and that he had control over it."

9 Q Okay. And that was your comment?

10 A Those were notes that I took while on
11 the call with CoC.

12 Q And --

13 A Or -- or just notes that I was
14 writing, one or the other.

15 Q Were you then at that time attempting
16 to justify from your standpoint including Pastor
17 Johnny Hunt in this section?

18 MR. KLEIN: Objection as to form.

19 You can answer.

20 THE WITNESS: No.

21 BY MR. MACGILL:

22 Q Were you expressing concern, Ma'am,

1 that Pastor Johnny Hunt was not a member of the
2 Executive Committee at the time of the alleged
3 assault?

4 MR. KLEIN: Objection as to form.
5 Outside the scope.

6 You can answer.

7 THE WITNESS: No.

8 MR. MACGILL: Okay. We've been going
9 close to an hour, why don't we take a break. And
10 we'll take a look at our notes.

11 VIDEOGRAPHER: The time is 3:33 p.m.
12 We are going off the record.

13 (Recess from 3:33 p.m. to 3:48 p.m.)

14 VIDEOGRAPHER: The time is 3:48 p.m.
15 We are going back on the record.

16 Please proceed, Counsel.

17 BY MR. MACGILL:

18 Q Now, Ma'am, I want to go back to the
19 exhibit that we left off on. This is Exhibit 109,
20 at the top of that page 314. Do you have that in
21 front of you?

22 A I do.

1 Q This says, "As per the motion we were
2 asked to examine allegations of abuse against EC
3 members during the relevant time period." And then
4 this comment we -- you mentioned, and I think you
5 read it out loud, "Explain why immediate past
6 president groomed during SBC EC member as
7 president." Was that a comment that came to you
8 from the Committee on Cooperation?

9 MR. KLEIN: Objection. Asked and
10 answered.

11 You can answer again.

12 THE WITNESS: It was either -- it was
13 either from them or a comment that I wrote, I don't
14 remember which.

15 BY MR. MACGILL:

16 Q Okay. And essentially the concern
17 had been raised by someone that Pastor Johnny Hunt
18 was not a member of the Executive Committee at the
19 time of the alleged assault. Is that fair?

20 MR. KLEIN: Objection as to form.

21 You can answer.

22 THE WITNESS: No, not necessarily.

1 BY MR. MACGILL:

2 Q Let's go to the next exhibit. I'm
3 sorry, it's the next page, I should say.

4 A Okay.

5 Q It's page 493. And then there's a
6 comment here that it -- it's the paragraph -- fifth
7 paragraph down, "Survivor began to feel foggy when
8 she went inside."

9 Do you see that?

10 A Yeah, just give me a second to --

11 MR. KLEIN: And I would also note,
12 Rob, while we're waiting for Ms. Tongring to get to
13 that page, this is designated attorneys' eyes only.
14 I do see your client is back on the Zoom. If
15 you're going to ask her specifically about this
16 draft and these particular comments, that your
17 client be put in a separate Zoom room just for
18 this -- these questions.

19 MR. MACGILL: Okay.

20 MR. KLEIN: Thank you.

21 BY MR. MACGILL:

22 Q "Survivor began to feel foggy when

1 she went inside." Do you see that?

2 A I do.

3 Q And there's -- that's highlighted.
4 Can you tell us why that was highlighted?

5 A No. I don't recall.

6 Q Then there's a comment. Is this your
7 comment, "Make this more clear, she said no, do not
8 go into the bedroom"?

9 A Yes.

10 Q All right. And this was a comment
11 that you got from the Committee on Cooperation?

12 A Not necessarily.

13 Q Okay. Again, it may have been your
14 comment, it may have been from the Committee on
15 Cooperation?

16 A No, it wouldn't have been from the
17 Committee on Cooperation.

18 Q Okay.

19 A That wouldn't have had that
20 information.

21 Q All right. Look at page 96 -- hold
22 on. I'm sorry. Exhibit 109, page 490.

1 A What page number?

2 Q 13490, page 1 of 14. Do you see at
3 the bottom May 13 at 7:56 p.m. --

4 A Uh-huh.

5 Q -- you are e-mailing Russell Holske,
6 Samantha Kilpatrick, with a copy to the -- to your
7 boss, right?

8 A I do, I see that.

9 Q And you say, "Julie is going to
10 finish up a call with one of the CoC in a few
11 minutes. Can you guys jump on a call around
12 on Johnny Hunt -- on the JH matter?"

13 Do you see that?

14 A I do.

15 Q And Samantha Kilpatrick says yes,
16 Mr. Holske says yes. Is that right?

17 A Yes, I see that.

18 Q And then later that evening, Friday,
19 May 13th, at 9:15 p.m., you write "As discussed."

20 A Uh-huh.

21 Q Is that correct?

22 Does that refresh your memory on what

1 you -- what you're doing?

2 MR. KLEIN: Objection as to form.

3 You can answer.

4 THE WITNESS: I -- I mean "as
5 discussed," I assume there was something attached
6 to that e-mail.

7 BY MR. MACGILL:

8 Q Well, look at the top e-mail then.
9 Mr. Holske writes to you and Ms. Kilpatrick and
10 says, "Attachments, draft Hunt's section for
11 cocktedits.docx."

12 Do you see that?

13 A I see that.

14 Q Did you see this section -- did you
15 see these edits at some point in time?

16 A I believe that's the attachment that
17 we're looking at.

18 Q That's -- okay. Fair enough.
19 Does that remind you of the sequence
20 of events here?

21 MR. KLEIN: Objection as to form.

22 You can answer.

1 THE WITNESS: Yeah. So I think what
2 happened was we had -- the four of us had a call,
3 and then during the phone call, I took notes and my
4 notes were reflected in the comments that I then
5 sent to Samantha and Russ and cc'd Julie.

6 BY MR. MACGILL:

7 Q Okay.

8 A And then Russ forwarded that to
9 Samantha and said, "Call me when you want to go
10 through it."

11 Q Meaning the report which included
12 your comments?

13 A Correct.

14 Q Some of which we just reviewed?

15 A Right. But I don't know what they --
16 the two of them did with it obviously. Well, maybe
17 not obviously, but . . .

18 Q Let's go to the next exhibit. This
19 is going to be Exhibit 130 [sic].

20 (Tongring Deposition Exhibit Number 110
21 marked for identification.)
22

1 BY MR. MACGILL:

2 Q I'm sorry, 110.

3 A Okay.

4 Q And is this -- looking at page 1 of
5 14, do you see this is an e-mail on May 14, at
6 5:18 a.m. from Mr. Holske?

7 A Uh-huh.

8 Q And --

9 A Yes.

10 Q -- it's sent to you, Ms. Wood, and
11 Christina Bischoff. Is that right?

12 A Yes.

13 Q And it says, "Draft Hunt section for
14 CoC edits with RH and SK edits."

15 Do you see that?

16 A Yes.

17 Q "RH" stands for what?

18 A Russ Holske.

19 Q And "SK" stands for what?

20 A Samantha Kilpatrick.

21 Q Was Russ Holske editing the Guidepost
22 report, Ma'am?

1 A No. He was editing this section.

2 Q Was he editing a portion of the
3 Guidepost report?

4 A Yes, he was editing this section.

5 Q Which section?

6 A The "draft Johnny Hunt" section.

7 Q So you have -- strike that.

8 As you saw that that was an event
9 that is occurring, did you have a witness editing
10 your report?

11 Is that the protocol that you think
12 is acceptable?

13 A Russ Holske was not a witness, he was
14 an investigator.

15 Q So my mistake.

16 Did you come to know that Mr. [REDACTED]
17 [REDACTED] was editing your report?

18 A [REDACTED] [REDACTED] did not edit our report.

19 Q Are you saying that [REDACTED] [REDACTED] made
20 no -- strike that.

21 Were you aware that Mr. Holske asked
22 Mr. [REDACTED] to review factual sections of the

1 Guidepost's report?

2 A Yes.

3 Q Do you know that he proposed edits?

4 A Yes.

5 Q Do you know that some of his edits
6 were included by your company?

7 A Yes.

8 Q Do you consider that to be an
9 independent report that is -- as edited by
10 witnesses -- a witness, Mr. [REDACTED]

11 A I don't believe those would be
12 considered edits, but yes, I do believe that that
13 is independent and appropriate.

14 Q Why didn't you just have Mr. [REDACTED]
15 have -- make his 53-page document your report?

16 MR. KLEIN: Objection as to form.
17 Outside the scope.

18 You can answer.

19 BY MR. MACGILL:

20 Q He was authoring part of your
21 Guidepost report, right?

22 A I don't agree with that statement.

1 Q He was -- all right. Let's parse his
2 language in ways that you prefer. So you say --

3 MR. KLEIN: Objection as to that
4 characterization, Rob. And just ask the question
5 as opposed to a statement.

6 BY MR. MACGILL:

7 Q You -- you say in your parsing of
8 words that editing -- authoring is not the right
9 word when it comes to Mr. [REDACTED] right?

10 MR. KLEIN: Objection. Outside the
11 scope.

12 You can answer if you can.

13 THE WITNESS: I'm sorry. You're --

14 BY MR. MACGILL:

15 Q According to you --

16 A You're confusing -- I'm sorry.
17 You're confusing me.

18 Q According --

19 A I thought what you said --

20 Q I will restate --

21 A -- that what you --

22 Q I will restate --

1 MR. KLEIN: Let him restate the
2 question.

3 THE WITNESS: Okay.

4 MR. KLEIN: Ask a new question.

5 BY MR. MACGILL:

6 Q According to you, [REDACTED] [REDACTED] did
7 not author any report -- part of the Guidepost
8 report?

9 A No, he didn't author it. No.

10 Q Okay. Did [REDACTED] [REDACTED] edit portions
11 of the Guidepost report?

12 MR. KLEIN: Objection. Asked and
13 answered.

14 You can answer.

15 THE WITNESS: Okay. Thank you.

16 No, he didn't edit.

17 BY MR. MACGILL:

18 Q Did you give Mr. [REDACTED] -- did the
19 Guidepost give Mr. [REDACTED] an opportunity to provide
20 edits to the Guidepost's report?

21 MR. KLEIN: Objection. Asked and
22 answered.

1 You can answer though.

2 THE WITNESS: We gave what -- excuse
3 me. Guidepost gave Mr. [REDACTED] the opportunity to
4 review and confirm the factual accuracy.
5 Mr. [REDACTED] provided additional, more than what we
6 asked him to do when he returned the portions that
7 we gave him.

8 BY MR. MACGILL:

9 Q The portions of what he gave back to
10 you were included in the Guidepost report. Is that
11 right?

12 A If they confirmed or enhanced the
13 factual accuracy, then yes, they would be.

14 Q And so he gave you a redline, some of
15 which you -- redline edits, some of which Guidepost
16 accepted, some of which Guidepost did not. Is that
17 right?

18 MR. KLEIN: Objection. Asked and
19 answered.

20 You can answer.

21 THE WITNESS: We accepted things that
22 confirmed or enhanced the factual accuracy.

1 BY MR. MACGILL:

2 Q All right. Now, I want to -- so
3 that's the process that was -- was that part of
4 your deliberative process, to give a witness a
5 chance to confirm or not certain portions of the
6 report?

7 A Sometimes.

8 Q Now, let's switch topics -- switch
9 witnesses. I want you to explain to the court
10 exactly, and to this jury exactly, what you did in
11 terms of Pastor Johnny Hunt, what opportunity did
12 you give him to review and proffer or propose edits
13 to your report?

14 MR. KLEIN: Objection as to form.
15 Outside the scope.

16 You can answer.

17 THE WITNESS: We did not.

18 BY MR. MACGILL:

19 Q Okay. Now, just in terms of being an
20 ordinary citizen, or someone who's going to comply
21 with the law or be attentive to issues of
22 defamation, casting a person in a false light,

1 don't you think it would have been fair to give the
2 same opportunity to Pastor Johnny Hunt that you did
3 to Mr. [REDACTED] [REDACTED]

4 MR. KLEIN: Objection. Clearly
5 outside the scope.

6 He's asking for your personal view,
7 so you can provide that personal view.

8 THE WITNESS: I stand by our process.
9 BY MR. MACGILL:

10 Q So your process is to give it to the
11 witness -- to one witness, but not -- your
12 protocol -- strike that.

13 Your protocol is to give it to one
14 witness and selectively choose that witness and not
15 give the opportunity to edit to any other witness.
16 Is that right?

17 MR. KLEIN: Objection as to form.

18 You can answer.

19 THE WITNESS: I stand by our process.
20 BY MR. MACGILL:

21 Q Okay. And your process didn't
22 include giving Pastor Johnny Hunt an opportunity to

1 review and edit any portion of the report, right?

2 MR. KLEIN: Objection. Outside the
3 scope.

4 But you can answer.

5 THE WITNESS: He was not given an
6 opportunity to review the portion that applied to
7 him and his statements.

8 BY MR. MACGILL:

9 Q Tell the Court why. Tell the Court
10 why did you that, Ma'am.

11 I'd you to explain in your own words
12 why it was that you, for your part, and those who
13 acted in concert with you at Guidepost, chose not
14 to give Pastor Johnny Hunt that same opportunity.

15 MR. KLEIN: Objection. Outside the
16 scope.

17 He's asking for your personal view
18 during a 30(b)(6) deposition, but you can answer
19 in your personal view if you know.

20 THE WITNESS: Because we did not need
21 to -- there was nothing to corroborate, he denied
22 that he had any contact with her.

1 BY MR. MACGILL:

2 Q Anything else you want to explain to
3 the jury at this time?

4 A No.

5 Q Did you offer a comment at time -- at
6 some point that the Guidepost team should go into
7 more detail about journals and why they are so
8 important for corroboration?

9 MR. KLEIN: Objection. Outside the
10 scope.

11 You can answer.

12 THE WITNESS: I don't remember.

13 BY MR. MACGILL:

14 Q Did you understand that [REDACTED] [REDACTED]
15 was insecure about Johnny Hunt?

16 A I don't know.

17 Q Did you send a -- did you send a
18 portion of the report relating to Pastor Johnny
19 Hunt to Mr. Frank before publication?

20 A Mr. Frank -- Dr. Frank is part of --
21 the Sexual Abuse Task Force was provided with the
22 entire report.

1 Q Why did -- did you send him a -- did
2 you send him a portion of the report relating to
3 Pastor Johnny Hunt, that is to Mr. Frank, before
4 publication?

5 MR. KLEIN: Again, are you asking now
6 in her personal capacity or as -- as -- on behalf
7 of Guidepost?

8 MR. MACGILL: I'm asking about what
9 she did.

10 MR. KLEIN: Okay.

11 BY MR. MACGILL:

12 Q Did you -- I'm talking about you now.
13 Do you understand?

14 MR. KLEIN: Well, I don't because
15 we're in a 30(b)(6), but you can ask her that.

16 MR. MACGILL: Well, you -- all right.

17 MR. KLEIN: You can, Rob. I'm saying
18 that's tomorrow, and so you can ask her -- I wanted
19 to understand -- I wanted to understand in what
20 capacity, that's all.

21 BY MR. MACGILL:

22 Q Were you aware of anyone at Guidepost

1 sending a -- the portion of the report relating to
2 Pastor Johnny Hunt to Mr. Frank?

3 A Only that portion?

4 Q Yes.

5 A I don't recall.

6 Q Would you go to Exhibit 110 --

7 A Uh-huh.

8 Q -- page 6 of 14? Bates Number 587.

9 A Okay.

10 Q The paragraph -- there's a paragraph
11 highlighted here, "The Pastor provided us with a
12 hard drive on which he kept an electronic journal
13 that contains entries related to the counseling
14 sessions with Mr. Blankenship, as well as some
15 audio recordings of the counseling and Pastor's
16 thoughts following the counseling sessions."

17 Do you see that?

18 A I do.

19 Q Are those your highlights?

20 A It's -- it goes with both my comment
21 and Russ' comment. They're highlighted because
22 there is a comment there, so yes.

1 Q Your comment was to go into more
2 detail about journals why it's so important for
3 corroboration, right?

4 A That's what's written there. So you
5 have to understand that when my process when
6 we're -- when there is a call or something about
7 documents is I will make a comment that is
8 memorializing the collective thoughts on the call.
9 It's not necessarily what I think, it's what needs
10 to be done and why. It doesn't mean that I'm
11 thinking this.

12 Q There's a comment you also made that
13 you said "confirm" and that you're referring to
14 First Baptist Church Woodstock and CEO of
15 HopeQuest, a counseling ministry.

16 Why did you make that comment
17 "confirm"?

18 MR. KLEIN: Objection as form.
19 You can answer.

20 THE WITNESS: Again, the same process
21 that I just described. This is likely a phone
22 group or a group was discussing this portion of the

1 report and we needed this to be confirmed, as it
2 looks like, by Russ' comment, it was.

3 BY MR. MACGILL:

4 Q Who is Stephanie Douglas?

5 A Stephanie Douglas is a Guidepost
6 employee.

7 Q And did Ms. Wood sent -- are you
8 aware that Ms. Wood sent her a version of the
9 report prior to publication?

10 A I was not, but I'm not surprised
11 because she was part of our team.

12 Q In early portions of the Guidepost
13 drafting, Mrs. [REDACTED] is referred to as "the wife."
14 Do you understand that?

15 MR. KLEIN: Objection as to form.
16 Outside the scope.

17 But you can answer if you know.

18 THE WITNESS: I have a recollection
19 that she may have been.

20 BY MR. MACGILL:

21 Q In the final report Mrs. [REDACTED] is
22 referred to as survivor. Are you aware of that?

1 MR. KLEIN: Same objection.

2 You can answer if you know.

3 THE WITNESS: That sounds correct.

4 We went through the report in the very end to make
5 it consistent throughout where sexual abuse
6 survivors were uniformly referred to as survivor.

7 BY MR. MACGILL:

8 Q And were you attempting to create the
9 impression through that that Mrs. [REDACTED] was the
10 survivor of a sexual assault?

11 MR. KLEIN: Objection as to form.
12 Outside the scope.

13 You can answer. It also calls for
14 a legal conclusion, but you can answer.

15 THE WITNESS: We, again in an attempt
16 to be uniform throughout the report, referred to
17 all survivors of sexual abuse or sexual assault as
18 survivor. There was not an attempt to create
19 anything. That was how we referred to anyone in
20 that capacity.

21 BY MR. MACGILL:

22 Q Now, looking at --

1 MR. MACGILL: If we could look at the
2 next exhibit, this is Exhibit 111. And this is an
3 e-mail from Stephanie Douglas to Julie Myers Wood.

4 (Tongring Deposition Exhibit Number 111
5 marked for identification.)

6 BY MR. MACGILL:

7 Q Do you see that?

8 A I do.

9 Q And then I -- a question that I have
10 relative to this -- did you look at this document
11 in preparation for your deposition today?

12 A I don't recall seeing it. No, I
13 don't believe I did.

14 Q Now, take a look at page 2 of 4.
15 There's a highlighted -- there's highlighting here
16 on the third paragraph. "Some of the unusual
17 attention includes remarks about her appearance,
18 unwelcome touching, including kissing her hand and
19 inappropriate comments of a sexual nature."

20 Do you see that highlighting?

21 A I do.

22 Q And then there's a comment here. It

1 says, "Does this constitute grooming?" Do you know
2 whose comment that was?

3 A Based on the initials from the
4 comment, and in the context of the e-mail, I would
5 say Stephanie Douglas.

6 Q Was Rachael Denhollander provided a
7 copy of the report in advance of its publication?

8 A She was part of the Sexual Abuse Task
9 Force, so yes, she would have been.

10 Q Are you aware that the CEO of your
11 company, Ms. Wood, testified that the actual amount
12 that Guidepost was owed for the report was closer
13 to [REDACTED]

14 MR. KLEIN: Objection as to form.
15 Outside the scope of the topics. And asked and
16 answered.

17 But you can -- or mischaracterizes
18 her statement. But you can answer.

19 THE WITNESS: Yes, I am aware of
20 that.

21 BY MR. MACGILL:

22 Q Are you aware that after the report

1 was published that Mr. [REDACTED] -- strike that.

2 Do you remember Mr. [REDACTED] writing an
3 e-mail to you and others after publication of the
4 report stating, for example, the Guidepost report,
5 quote, Causes readers to think I knew it was SA.
6 In the moment, I did not?

7 MR. KLEIN: Objection.

8 BY MR. MACGILL:

9 Q Do you recall that comment?

10 MR. KLEIN: Objection as to form.
11 Outside the scope.

12 You can answer in your personal
13 capacity, if you know.

14 THE WITNESS: I sort of recall that.

15 BY MR. MACGILL:

16 Q Well, in fact, that's what he said,
17 isn't it?

18 Did you read that -- that -- his
19 May 30th e-mail to you and others --

20 MR. KLEIN: Objection as to --

21 BY MR. MACGILL:

22 Q -- his May 3rd, 2022 e-mail --

1 MR. KLEIN: Objection. Outside
2 the --

3 BY MR. MACGILL:

4 Q -- or --

5 MR. KLEIN: I'm sorry, Rob. Keep
6 going.

7 BY MR. MACGILL:

8 Q Did you read his e-mail dated May 30,
9 2022, in preparation for your testimony?

10 A I don't think I read that in
11 preparation for my testimony, no.

12 Q Do you recall Mr. Holske forwarding a
13 message dated May 30, 2022, from [REDACTED] [REDACTED]
14 pertaining to his concerns about the Guidepost
15 report?

16 MR. KLEIN: Objection. Outside the
17 scope.

18 You can answer in your personal
19 capacity.

20 THE WITNESS: I recall receiving
21 e-mails. I do not recall their content.

22

1 BY MR. MACGILL:

2 Q Was there media attention to the
3 Guidepost report after it was published?

4 A Yes.

5 Q Was there -- was there a Washington
6 Post article?

7 A I believe so.

8 Q A Daily Mail article?

9 A I don't know.

10 Q CNN coverage?

11 A I believe so.

12 Q MBC News coverage?

13 A I don't know.

14 Q New York Times article?

15 A Maybe. I don't know.

16 Q Just in terms of the first interview
17 of Pastor Johnny Hunt, I want to focus just on the
18 first interview for a few minutes.

19 Are you aware that during the first
20 interview of Pastor Johnny Hunt, that Mr. Holske
21 and Ms. Kilpatrick did not ask Pastor Johnny Hunt a
22 single question about the alleged sexual assault?

1 A Yes.

2 Q Are you aware that during that first
3 interview that Mr. Holske and Ms. Kilpatrick did
4 not even mention [REDACTED] [REDACTED] by name?

5 A Yes.

6 Q Are you aware, Ma'am, that Mr. Holske
7 and Mr. Kilpatrick during this -- or Ms. Kilpatrick
8 during this first interview did not even mention
9 [REDACTED] [REDACTED] by name?

10 A Yes.

11 Q At the time of this first interview
12 of Pastor Johnny Hunt, your investigators had
13 conducted at least six interviews of the [REDACTED]
14 individually or collectively by that time. Is that
15 right?

16 A If -- if you say that that is
17 correct. I don't recall the actual dates, but I'm
18 sure that there were a number of interviews of the
19 [REDACTED] before the first interview of Mr. Hunt.

20 Q Ma'am, I would like you to turn --
21 let's turn to the deposition notice here for a
22 minute. I'm going to focus on Topic 8.

1 A What document number is that, please?

2 Q It's Exhibit 106, Document 1, I
3 think -- 2.

4 A Thank you.

5 Q Did you come prepared, Ma'am, to
6 testify on Topic 8?

7 A I need to get there.

8 MR. KLEIN: Rob, while Ms. Tongring
9 is getting there, I will note that we objected on
10 Guidepost's behalf to this topic. And so she was
11 not prepared to speak on behalf of Guidepost, and
12 is not prepared to speak on behalf of Guidepost,
13 with regards to this topic. But if you want to ask
14 her in her personal capacity, she will answer as
15 best she can.

16 BY MR. MACGILL:

17 Q Ma'am, tell the court, are you here
18 to testify as the corporate representative on Topic
19 8?

20 You understand that?

21 MR. KLEIN: Objection. She is not
22 here to testify about Topic No. 8.

1 MR. MACGILL: Well, according to us,
2 she is. And you -- you had the obligation to
3 confer with us and to come to a resolution or to
4 file a protective order. Mr. Mintz never made --
5 never called me to ask about it. You -- you had to
6 get court relief, you didn't. And you needed to
7 confer about it -- specifically Mr. Mintz needed to
8 confer with me about it. He never proposed to do
9 so.

10 So you're obligated to give
11 testimony on this topic. So if -- if you want
12 get relief after the fact, do what you need to
13 do, but she's here to testify, and is obligated
14 to give testimony, on this topic.

15 MR. KLEIN: She will most certainly
16 not give corporate testimony on this topic. She
17 absolutely is -- if she knows --

18 MR. MACGILL: If you --

19 MR. KLEIN: Let me finish my -- I let
20 you speak, Rob, just let me speak.

21 MR. MACGILL: Okay.

22 MR. KLEIN: She will not give

1 corporate testimony on this topic, as we objected.
2 We sent numerous meet and confer requests. You and
3 I had a phone call saying that we would try to meet
4 and confer. I followed up with no less than three
5 e-mails where you were unavailable at all the times
6 I had proposed. We tried to meet and -- let me
7 finish, Rob. Let me finish, please.

8 We tried to meet and confer in good
9 faith. You refused or failed to meet us in that
10 regard. We are here. I asked -- in my last
11 e-mail, I invited you to --

12 MR. MACGILL: You are --

13 MR. KLEIN: -- postpone the
14 deposition if you wanted to --

15 MR. MACGILL: No.

16 MR. KLEIN: -- you choose not to. We
17 are here in good faith to answer all of the
18 questions that we have agreed to. Any other
19 question you can still ask her. She has been
20 answering in her individual capacity. It was not
21 our obligation based on that background for us to
22 run in and seek a protective order where we have

1 tried, without help from your side, to have the
2 meet and confer that is required.

3 MR. MACGILL: We repeatedly --
4 you're -- you're irrelevant to this process now.
5 You are completely irrelevant. The only person
6 that's relevant is Mr. Mintz. You cannot confer.
7 You know you have no authority to confer. You're
8 not the lead counsel, Mr. Mintz is. And I'm lead
9 counsel on my side.

10 We offered repeatedly to meet with
11 you. And the e-mails will confirm that. I
12 offered Friday -- we were in testimony all week
13 last week. I offered Friday, you didn't take my
14 Friday date. On Monday you called it off. We
15 offered to meet on Monday and meet and confer
16 with you on Monday as well. Mr. Mintz has never
17 been available.

18 You're obligated to get a
19 protective order in order to avoid the obligation
20 to testify. And that's clear law in this
21 district. So this was your obligation. We don't
22 need to argue about it. You go file your motion

1 and we'll file ours.

2 MR. KLEIN: We don't --

3 MR. MACGILL: But I want to know now
4 that she is not prepared and I want to make my
5 record.

6 MR. KLEIN: She is -- I'm making the
7 regard for her --

8 MR. MACGILL: Well, she --

9 MR. KLEIN: -- she is not prepared.

10 MR. MACGILL: No, you don't --

11 MR. KLEIN: This is a legal issue,
12 Rob. She is not prepared to speak about this
13 topic. And we have made our record crystal clear.
14 And I look forward to the motion and the reaction
15 by the judge to the paper trail that we have given.
16 And it wasn't a paper trail, we wanted to meet and
17 confer with you. We did.

18 MR. MACGILL: Where were you -- where
19 were you Friday afternoon?

20 Why didn't you --

21 MR. KLEIN: I told you I was in the
22 airport ready to board a plane. I explained that

1 to you and your colleague when I asked --

2 MR. MACGILL: Enough said.

3 MR. KLEIN: -- when I gave you four
4 options --

5 MR. MACGILL: Even though you --

6 MR. KLEIN: -- five options.

7 MR. MACGILL: With all due respect,
8 you're not relevant. The only person that's
9 relevant is Mr. Mintz.

10 MR. KLEIN: But you did not offer one
11 time -- you knew I was speaking for both of us.
12 You knew I was speaking for both of us and you
13 chose to sandbag me here. That will also be
14 reflected in any motion that is brought. But I
15 don't want to take any more time here, Rob. You
16 can ask the questions, I will raise my objections
17 as the questions are asked.

18 BY MR. MACGILL:

19 Q Tell the court the total number of
20 clicks, views, and overall engagement on links and
21 banners on Guidepost's website relating to the
22 report.

1 MR. KLEIN: Objection as to form.
2 Outside the agreed-upon topics.

3 You can answer in your personal
4 capacity if you know.

5 THE WITNESS: I don't know.

6 BY MR. MACGILL:

7 Q What did you do to repair on this --
8 prepare to give testimony specifically on the Topic
9 of 8A?

10 A I don't know.

11 MR. KLEIN: Objection as to form.
12 This was not an agreed-upon topic. We did not
13 prepare.

14 But you can answer that question.

15 THE WITNESS: I did not.

16 BY MR. MACGILL:

17 Q Tell the court what steps you took to
18 testify in Topic 8B, the total number of clicks,
19 views, shares, likes, comments, and engagements on
20 any social media post pertaining to the report.

21 MR. KLEIN: Objection. Outside the
22 scope of the agreed-upon topics despite the request

1 to meet and confer.

2 You can answer in your personal
3 capacity though if you know.

4 THE WITNESS: I did not.

5 BY MR. MACGILL:

6 Q Looking at Topic 7, are you prepared
7 to testify on Topic 7?

8 MR. KLEIN: Same objection. We
9 agreed to talk about reference to the report on the
10 Guidepost website, which she has. So with that
11 limitation, she is authorized and already has given
12 corporate testimony in regard to No. 7. The
13 breadth of it, we objected to, but we offered a
14 narrowing, which she already testified to today.

15 BY MR. MACGILL:

16 Q What did you do to prepare to testify
17 on Topic 7?

18 MR. KLEIN: Again, with the
19 limitation provided, she can answer that question
20 with regard to the limitation.

21 Please feel free to review the
22 question if you need.

1 THE WITNESS: The marketing of it.

2 MR. KLEIN: Oh, you have it there.

3 THE WITNESS: Yeah.

4 MR. KLEIN: Thank you.

5 BY MR. MACGILL:

6 Q Are you prepared to testimony on the
7 marketing efforts of Guidepost --

8 MR. KLEIN: Objection. Outside --

9 BY MR. MACGILL:

10 Q -- as described here?

11 MR. KLEIN: Objection. Outside the
12 scope of the agreed-upon topics and what we agreed
13 to provide.

14 But you can answer that question.

15 THE WITNESS: I'm prepared to talk
16 about the -- how the -- basically the SBC EC tab on
17 our website and what was included therein.

18 BY MR. MACGILL:

19 Q What marketing advertising and
20 promotional efforts were made by Guidepost
21 associated with the report?

22 MR. KLEIN: Objection. Outside the

1 scope of the agreed-upon topics.

2 But you can answer in your personal
3 capacity if you know, if there were any.

4 THE WITNESS: I don't believe there
5 were any.

6 BY MR. MACGILL:

7 Q Were there any -- was there any
8 marketing effort by Guidepost associated with the
9 report?

10 MR. KLEIN: Objection as to form.

11 But you can answer in your personal
12 capacity if you know.

13 THE WITNESS: I don't believe there
14 were any.

15 BY MR. MACGILL:

16 Q Did you -- what did you do to prepare
17 to answer that question?

18 MR. KLEIN: Objection. It was
19 outside the scope of the agreed-upon topics.

20 You can answer.

21 BY MR. MACGILL:

22 Q Counsel keeps referring to

1 agreed-upon topics. There's no agreement of any
2 kind or nature with your counsel, Ma'am. You're
3 here to testify according to our notice, not his
4 unilateral statements of what he's agreed to do.
5 There's been no agreement with your company. And I
6 want you to know that for our part. He can say it
7 until the end of the day, tomorrow, the next day,
8 there's no agreement, and there can't be an
9 agreement, and there will not an agreement on this
10 topic. And if there's going to be any agreement,
11 it's going to be lead counsel, Mr. Mintz. All
12 right? So I made my comments.

13 BY MR. MACGILL:

14 Q I just want -- I just want to show
15 that you have done nothing, to repeat nothing, to
16 prepare on Topic 7. You have done nothing to
17 prepare to give testimony as the corporate
18 representative on Topic 7, have you?

19 MR. KLEIN: Objection as to form.
20 I've already explained the basis of our objection.
21 You can answer that question.

22 THE WITNESS: That's not true. I am,

1 and was, prepared to talk about the SBC EC tab on
2 our web page. Other than that, I am not prepared,
3 nor did I do anything to prepare for the remainder
4 of Topic No. 7.

5 BY MR. MACGILL:

6 Q All right. And then what did you
7 do -- with respect to the SBC EC tab on the
8 website, what investigation did you do?

9 A I am aware of it because I was
10 largely responsible for it.

11 Q And what did you -- what did you do
12 to become aware of the details associated with that
13 insofar as the Guidepost report is concerned?

14 A Well, I typically was the one who
15 prepared the content that went on that tab. I
16 worked with our website people to have the tab put
17 on the website. And then would review it to make
18 sure that it was accurate at various places and
19 time and in all time frames. When the report was
20 published by the Task Force, I made sure that the
21 content again was on the website -- or on the, you
22 know -- behind the tab when you clicked on the tab

1 on our website. And that the -- it went to -- it's
2 still -- the Task Force link was always up there to
3 their website. And, you know, made sure that the
4 rest of the information was correct.

5 Q When you say the Task Force link,
6 what -- what are you referring to?

7 A The Task Force, I believe, still has
8 their own website where they would provide updates
9 to the SBC community and whoever else was
10 interested in the investigation. And there was a
11 link to their website on our page.

12 Q To a link to whose website?

13 A The Sexual Abuse Task Force.

14 Q And why did you put a link to the
15 Sexual Abuse Task Force on your website?

16 A Because as part of our engagement
17 letter, we agreed to keep the SBC survivor
18 community and anybody interested in the
19 investigation up to date. And so that was part of
20 the way that we kept the community up to date as to
21 what was happening in the investigation.

22 Q So if one went to your website to --

1 after the report was completed, describe how one
2 can get to the full report.

3 A I don't know exactly but -- because
4 we did not have a link to the report. They could
5 go to the Task Force website and however the Task
6 Force had a link to the report or however they did
7 it, they could find it there.

8 Q Well, they could find it through
9 your -- the -- anyone who wanted to see your report
10 could utilize -- could go to your website and get
11 there, right?

12 MR. KLEIN: Objection. Asked and
13 answered. Mischaracterizes her statement.

14 You can answer.

15 THE WITNESS: Assuming that there was
16 a link from the Sexual Abuse Task Force website, I
17 assumed that they could.

18 BY MR. MACGILL:

19 Q Well, you made sure, did you not, you
20 made sure that on your website that the report was
21 available to the people who visited your website,
22 right?

1 MR. KLEIN: Objection. Asked and
2 answered.

3 You can answer.

4 BY MR. MACGILL:

5 Q That was your job, to make sure that
6 people could access your report, right?

7 MR. KLEIN: Objection.

8 THE WITNESS: No.

9 MR. KLEIN: Asked and answered.
10 You can answer.

11 THE WITNESS: No.

12 BY MR. MACGILL:

13 Q Well, I'm looking at your website
14 right now, Ma'am, and there's a banner right here
15 that says, "SBC EC Report, Plus Hotline for
16 Survivors."

17 That's what it says right here on the
18 banner, right?

19 A I don't know. I don't have it in
20 front of me.

21 Q Okay. Ma'am, just to make sure that
22 we're crystal clear on what you're saying and that

1 we're clear on what you did, okay, I want to make
2 sure that the court here and the jury knows exactly
3 what you did, even as we sit here today. All
4 right?

5 So we'll look at your screen here in
6 a minute, we'll show you -- we'll show you the --
7 what we can see today. Okay?

8 A Okay.

9 (Tongring Deposition Exhibit Number 112
10 marked for identification.)

11 BY MR. MACGILL:

12 Q If you would click on Exhibit 112, if
13 you would please.

14 Are you there?

15 A No, I'm not there yet.

16 Q Are you there now?

17 A I'm trying to get it so that it's --
18 okay.

19 Q Now, this is how you manage your
20 website today. Do you recognize that as your
21 website today?

22 A Yes.

1 Q And we can see here, what's the
2 top -- read the top banner out loud, if you would.

3 A It says, "SBC EC Report and Hotline
4 for Survivors."

5 Q And what do you -- what do you offer
6 the visitor to your website?

7 You offer to click here, right?

8 A Uh-huh.

9 Q And if you click here, as you're
10 instructed, as the first banner on your site, where
11 does that take you, Ma'am?

12 A It takes you to another page, but I
13 can't click there so --

14 Q Well, you were prepared to give
15 testimony though today so we know that you're
16 prepared on this topic, right?

17 MR. KLEIN: Objection.
18 Argumentative. Completely unnecessary. And your
19 exhibit does not allow her to do what you are
20 asking her to do. So give her something else --
21 BY MR. MACGILL:

22 Q Ma'am --

1 MR. KLEIN: -- to do and she will.

2 MR. MACGILL: It's not going to
3 happen, Counsel.

4 MR. KLEIN: That's fine.

5 BY MR. MACGILL:

6 Q Ma'am --

7 MR. KLEIN: She can't answer a
8 question about a document she cannot access.

9 BY MR. MACGILL:

10 Q -- you prepared --

11 MR. KLEIN: -- and then blame her for
12 it.

13 BY MR. MACGILL:

14 Q You came here for -- the one thing
15 you did prepare on Topic 7, the one thing, Ma'am,
16 the one single thing that you actually prepared on
17 was the SBC EC tab on your website, right?

18 MR. KLEIN: Objection.

19 Mischaracterizes her statement.

20 You can answer.

21 THE WITNESS: I am aware of what
22 that -- I have not looked at it recently, so I

1 can't -- I -- I don't know what's currently there.

2 BY MR. MACGILL:

3 Q Ma'am, you just testified not three
4 minutes ago that you took preparations to testify
5 as behalf of the corporation about the SBC EC tab
6 on the website, did you not?

7 A I said I was prepared to testify on
8 that because that I was largely responsible during
9 the time of the investigation.

10 Q All right. And on May 20, did you
11 have the same tab here that you have today on -- in
12 late May 2022?

13 A I don't know.

14 Q Well, did -- when you prepared, did
15 you learn that one way or another, Ma'am?

16 A No.

17 Q Did you go back to what the website
18 looked like?

19 A I did not.

20 Q Well, how -- okay. Let's -- describe
21 now what -- you know, based on your preparation,
22 when you click here, as instructed by your website

1 in the top banner, where does that take you?

2 A It takes you to a page that has, as I
3 said before, information relating to the step --
4 again, I was talking about at the time of the
5 investigation, and at the time that the report was
6 published by the Task Force, and it had that
7 information. My role and responsibility, which was
8 what I was prepared to testify about it, was to
9 manage that content at that time.

10 Q Well --

11 A I am no longer responsible for that.

12 Q Well, the purpose of this tab is to
13 give the viewer with a means to access the report,
14 right?

15 A No.

16 Q No?

17 The top banner of your website is not
18 an invitation to access the report? No?

19 A It's to give information regarding
20 the report and the hotline. It is not --

21 Q Well --

22 A -- an invitation to view the report

1 because the report appears nowhere on our website.

2 Q "SBC EC Report and Hotline for
3 Survivors, Click Here," you're saying that's not an
4 invitation to review the report?

5 MR. KLEIN: Objection as to form.

6 You can answer.

7 THE WITNESS: As I said, the
8 report -- it is informational purposes only. The
9 report appears nowhere on our website. It is
10 information about the report and about the hotline.
11 BY MR. MACGILL:

12 Q Okay. Now, if we go -- again, let's
13 put aside what you testified to and look at the
14 realities of the website here for just a minute if
15 we could.

16 A Okay.

17 Q Okay. Is that fair enough?

18 Can we look in reality for a second?
19 May we do that?

20 A I would love to, but I can't.

21 Q Let's do it. Now, if you click on
22 this, Ma'am, you know, there's a reality here that

1 we want to contrast specifically with some of your
2 testimony. Let's -- the reality is if you click
3 here, where it takes you is to the Sexual Abuse
4 Hotline for Survivors, does it not?

5 A I don't know.

6 Q All right. Does it -- does it take
7 you to an SBC investigation and reports section?

8 A I don't know.

9 Q Does it -- does it tell you -- does
10 it instruct the participant, or the viewer of your
11 website specifically, that the report of the
12 independent investigation is now available from the
13 Task Force?

14 A I don't know.

15 Q Now, separate from what you don't
16 know about the SBC EC tab on the website, you don't
17 have any information of what advertising your
18 company did with respect to the Guidepost's report?

19 MR. KLEIN: Objection. Asked and
20 answered.

21 THE WITNESS: I would need to go back
22 to the original -- can I see the question?

1 MR. KLEIN: Yeah.

2 THE WITNESS: Can you repeat that,
3 please? I don't have any information as to what.

4 BY MR. MACGILL:

5 Q Let's go to Topic 5. Did you come
6 prepared to speak about the financial statements
7 for the years 2020 through 2023?

8 MR. KLEIN: Objection. Well beyond
9 the scope of the topics that we agreed to or tried
10 to agree to. And we did not agree to provide
11 information, nor did we prepare the witness for
12 that topic, but she can answer if she knows in her
13 personal capacity.

14 BY MR. MACGILL:

15 Q Ma'am, did you prepare to give
16 corporate testimony on behalf of the corporation on
17 any of the topics listed in Topic 5?

18 MR. KLEIN: Same objection.

19 But you can answer.

20 THE WITNESS: I need to see Topic 5.

21 No. And I don't know anything in
22 my personal capacity.

1 BY MR. MACGILL:

2 Q Did you take any steps to prepare on
3 Topic 4?

4 MR. KLEIN: Same objection. We
5 objected to that topic. We're unable to meet and
6 confer despite our good-faith efforts, and so the
7 witness is not prepared to speak to that.

8 But you can answer the question.

9 THE WITNESS: Other than I took no
10 steps to prepare on behalf of the corporation.
11 Other than what we've already discussed, I don't
12 have any other information.

13 BY MR. MACGILL:

14 Q Okay. How much did -- tell us about
15 how much time each employee billed on this matter.

16 MR. KLEIN: Objection. Outside the
17 scope of the topics we agreed to provide
18 information on.

19 But you can answer in your personal
20 capacity if you know.

21 THE WITNESS: I don't know.
22

1 BY MR. MACGILL:

2 Q How much did each independent
3 contractor bill in connection with this report?

4 A I don't know.

5 THE WITNESS: Sorry.

6 MR. KLEIN: That's okay.

7 Same objection.

8 BY MR. MACGILL:

9 Q And, again, you didn't do any
10 preparations on Topic 4?

11 MR. KLEIN: Objection. Asked and
12 answered.

13 And based on the previous
14 objection, you can answer.

15 THE WITNESS: I don't know.

16 BY MR. MACGILL:

17 Q Guidepost's organizational structure
18 for the years 2020 through 2024, are you prepared
19 to testify on that topic?

20 MR. KLEIN: I believe we agreed to
21 testify to a portion of that. I believe she's
22 already testified to it in her corporate capacity.

1 But you certainly can ask her for questions about
2 the reporting relationships of the people involved
3 in the section of the report referring to your
4 client and what their organizational reporting
5 requirements were.

6 BY MR. MACGILL:

7 Q What did you do to prepare on Topic
8 3?

9 MR. KLEIN: Other than communications
10 with counsel, you can answer that question if
11 you're able.

12 THE WITNESS: I am aware just by
13 virtue of knowing, you know, the -- who Russ
14 reports to. And then I'm trying to think of who
15 else. What Samantha's reporting structure was when
16 she was independent contractor. And I think that's
17 it.

18 BY MR. MACGILL:

19 Q You think that's it?

20 A Yes.

21 Q Nothing further?

22 A Nope.

1 Q On Topic 9, what did you do to
2 prepare on Topic 9?

3 THE WITNESS: I'm sorry, you can keep
4 it.

5 MR. KLEIN: Hang on a second.

6 We objected to this topic as being
7 inappropriate for 30(b)(6). We're willing to
8 meet and confer on it, but that did not happen
9 despite our efforts, and so the witness is not
10 prepared to answer in her corporate capacity,
11 though she can answer any questions you provide
12 in her personal capacity.

13 BY MR. MACGILL:

14 Q Ma'am, what did you do to prepare on
15 Topic 9?

16 Nothing, is that the answer?

17 MR. KLEIN: With that objection, you
18 can answer.

19 THE WITNESS: I have some personal
20 knowledge, but I did nothing to prepare as a
21 30(b)(6) witness.

22

1 BY MR. MACGILL:

2 Q What personal knowledge do you have
3 in terms of positions, roles, titles, compensation
4 of persons associated with the Guidepost report?

5 A I know what happened with me.

6 Q Okay. What happened to you?

7 A I was promoted from senior managing
8 director to executive vice president.

9 Q And did the Guidepost report have
10 anything to do with that in your judgment?

11 A No.

12 Q Why were you promoted?

13 A Because of the work that I do.

14 Q Okay. What about Mr. Holske?

15 A Not that I'm aware of.

16 Q Not promoted?

17 A Not that I'm aware of.

18 Q What about Ms. Kilpatrick?

19 A She was hired as a full-time
20 employee.

21 Q As a result of the Guidepost report?

22 A No.

1 Q Why?

2 A Why what?

3 Q Why was she promoted?

4 A She wasn't promoted. She was hired
5 as a full-time employee.

6 Q So that was not a promotion?

7 A No.

8 Q Okay. Lateral -- a lateral move in
9 your view?

10 A I don't know what she would consider
11 it.

12 Q Okay. You don't consider it a
13 promotion?

14 A I don't.

15 Q Okay. Was she promoted to run the
16 faith-based division of the Guidepost after the
17 Guidepost report -- pardon me.

18 Yeah, was she promoted,
19 Ms. Kilpatrick, to run the faith-based division of
20 Guidepost after the report to the SBC?

21 A She wasn't promoted because she
22 wasn't working for the company. She was an

1 independent contractor.

2 Q Did she --

3 A After -- after November, I think, of
4 2022, she was hired as a full-time employee. And
5 another division of the company was re-purposed and
6 renamed as the faith-based practice, I believe, and
7 Samantha was running it. But she couldn't be
8 promoted because she wasn't a full-time employee,
9 so . . .

10 Q So the -- was she in charge of the
11 faith-based practice before the Guidepost report?

12 MR. KLEIN: Objection. Asked and
13 answered.

14 You can answer.

15 THE WITNESS: No.

16 BY MR. MACGILL:

17 Q No.

18 Was she -- was she in charge of the
19 faith-based practice after the Guidepost report?

20 A She was hired after the Guidepost
21 report.

22 Q Very simple, Ma'am, before she wasn't

1 in charge, then after she was in charge of that
2 practice, right?

3 A It didn't exist before.

4 Q Right.

5 And it came into existence because of
6 the work that you sponsored on Guidepost, right?

7 A That's not true.

8 Q Well, Ma'am, that's up for the jury
9 to decide.

10 A Well, no, it's a factual issue, and
11 it's not true. We were trying to hire Samantha
12 before we were engaged by the SBC, so it's a
13 factual issue, and it's not true.

14 Q Well, let's talk about that, Ma'am.
15 Let's make sure we understand exactly what you're
16 saying.

17 So was there a faith-based practice
18 before the Guidepost report?

19 A In some way, shape or form, it just
20 wasn't called that.

21 Q Well, Ma'am, let's talk about
22 formalities. What was the formal name of the

1 faith-based practice prior to --

2 A Institutional Integrity.

3 Q Okay. Institutional Integrity, that
4 was the -- was it a section? What was it called?

5 A That's just what it was called.

6 Q Was it a department?

7 A It's just what it was called,
8 Institutional Integrity.

9 Q Practice area?

10 A Yeah.

11 Q Okay. So the Institutional Integrity
12 Practice Area existed prior to the Guidepost
13 report. Is that right?

14 A Uh-huh.

15 Q Who was in charge of that?

16 A I don't know.

17 Q All right. And --

18 A I don't think it had a formal leader.

19 Q Okay. And after the Guidepost report
20 was published, was there a faith-based practice
21 area created?

22 A Yes.

1 Q And when was that faith-based
2 practice area created at Guidepost?

3 A In November of 2022.

4 Q I see.

5 And that was how many months after
6 the Guidepost report pertaining to the SEC was
7 published?

8 A Six.

9 Q Six months after the Guidepost report
10 was published the faith-based practice group was
11 formed at Guidepost. Is that right?

12 A Uh-huh.

13 Q And who was in charge of the
14 faith-based practice group six months after the
15 Guidepost report was prepared?

16 A Samantha Kilpatrick.

17 Q Okay. Now, was there a compensation
18 change for her based on going from an independent
19 contractor of the company to the person now in
20 charge six months after the Guidepost report as the
21 head of the faith-based practice area?

22 A I don't know because she had her own

1 law firm, so I don't know what compensation changed
2 that would have been.

3 Q Now, focusing on advertising and
4 promotional efforts, what advertising and
5 promotional efforts did Guidepost endeavor or
6 pursue after May 2022, in relation to the
7 faith-based practice?

8 MR. KLEIN: Objection. Outside the
9 scope.

10 You can answer.

11 THE WITNESS: I know there was a
12 press release when Samantha came on. Other than
13 that, I don't know.

14 BY MR. MACGILL:

15 Q Well, their website is an easy
16 reference here. Did you look at your website on
17 what you said about faith-based solutions on your
18 website?

19 A I did not.

20 Q In preparation for your testimony
21 today, you didn't even go to the website to
22 determine what faith-based solution descriptions

1 are given on your website?

2 MR. KLEIN: Objection. Asked and
3 answered.

4 You can answer.

5 THE WITNESS: I did not.

6 BY MR. MACGILL:

7 Q Ma'am, I see with my own eyes here,
8 "faith-based solutions" on your website and --

9 A That makes sense.

10 Q Okay. And so this was an advertising
11 effort that was pursued after the Guidepost report
12 was issued to the SBC Executive Committee, right?

13 MR. KLEIN: Objection.
14 Mischaracterizes the testimony.

15 But you can answer.

16 THE WITNESS: That -- I -- no, I
17 disagree with that characterization, but you can --

18 BY MR. MACGILL:

19 Q Well, let's talk about facts, Ma'am.
20 The select experience -- the select experience
21 advertised on your website for faith-based
22 solution, the first entry is "Southern Baptist

1 Convention," isn't it?

2 A I don't know.

3 Q "Conducted a thorough and independent
4 investigation into the response to sexual abuse
5 allegations and an audit of procedures and actions
6 of the Credentials Committee." The first entry on
7 "Select Experience" under faith-based solutions,
8 right?

9 A I don't know.

10 MR. KLEIN: Objection as to form.

11 You can answer.

12 BY MR. MACGILL:

13 Q Ma'am, you knew in February --

14 MR. KLEIN: Hold you. You have to
15 let her answer the question, Rob. You asked her a
16 question, I told her she could answer and you
17 didn't let her answer, so I would just ask you to
18 let her answer the question unless you want to
19 withdraw it.

20 THE WITNESS: I don't know.

21 BY MR. MACGILL:

22 Q Okay.

1 A I'm not seeing what you are seeing.
2 And I said I didn't look at it.

3 Q Well, Ma'am, we asked you in
4 connection with our notice to look at exactly this.
5 And you've already testified to this court you did
6 nothing to determine to take any steps, right?

7 MR. KLEIN: Objection.
8 Mischaracterizes both your topics and the previous
9 testimony.

10 You can answer.

11 THE WITNESS: You are correct that I
12 did not -- I testified that I didn't look, so --
13 BY MR. MACGILL:

14 Q Okay.

15 A -- I've already said I didn't look.
16 I don't know what you're reading. And I don't know
17 what's there.

18 Q Well, the -- I mean, you -- do you
19 have any doubt that you have a web -- a page -- a
20 landing page that says "Faith-based solutions"?

21 Any doubt about that?

22 A I'm quite sure we do.

1 Q And select experience, number one,
2 first reference is this Guidepost report on the
3 SBC, right?

4 A The report is not there.

5 Q Okay. Now, with respect to -- are
6 you aware of a follow-on engagement with the SBC
7 Executive Committee after the publication of the
8 Guidepost report in May of 2022?

9 A Yes.

10 Q And are you aware that the Abuse and
11 Reform Implementation Task Force announced that it
12 made a recommendation to the Credentials Committee
13 to utilize Guidepost in establishing a ministry
14 check website?

15 A Then we're talking about a different
16 follow-on engagement. I'm sorry.

17 Q You understand that that particular
18 engagement did occur?

19 A No. That's untrue.

20 Q That's not true?

21 A No.

22 Q Okay. Now -- so you're saying that

1 you were not engaged -- are you saying Guidepost
2 was never engaged by the Abuse Reform and
3 Implementation Task Force to do a ministry check
4 website?

5 A That's correct.

6 Q Okay.

7 A To my knowledge, we were not.

8 Q Do you know them about being fired
9 from any such engagement at some point in time?

10 A I believe we were.

11 Q So you were engaged and then fired or
12 you're --

13 A No, we were --

14 Q -- telling me --

15 A -- no -- please. I'm sorry. Let
16 me -- let me stop you.

17 We were supposed to be engaged.

18 They -- they had said to us that we were -- to my
19 understanding, we were supposed to be engaged and
20 then they decided to go with somebody else, but we
21 were never -- we never, to my knowledge, signed an
22 engagement letter, so we were never formally

1 engaged. When I said that I knew we were engaged,
2 I was speaking of the hotline.

3 Q Okay. Now, Ma'am, going back to your
4 website for a minute, I'm going to show you another
5 exhibit.

6 (Tongring Deposition Exhibit Number 113
7 marked for identification.)

8 BY MR. MACGILL:

9 Q All right. Exhibit 113, do you have
10 that in front of you?

11 A Not yet.

12 Yes.

13 Q And do you see that -- do you see the
14 reference to the -- the "SBC Investigation and
15 Report"?

16 A I see it.

17 Q And then what is the -- look at the
18 address up above, what does that say, the website
19 at the top of the page?

20 A "Guidepostsolutions.com/
21 SBC-EC-investigation."

22 Q Okay. And did you look at this

1 particular page in preparation for your report --
2 or your testimony?

3 A I said that I did not, no.

4 Q And the report of the independent
5 investigation is linked here by this mechanism, is
6 it not?

7 MR. KLEIN: Objection. That is
8 factually inaccurate. And you know she cannot
9 testify to that because she doesn't have access to
10 the link, but I do, and it does not link to the
11 report.

12 MR. MACGILL: Do you want to take the
13 witness stand, Counsel?

14 MR. KLEIN: No, but I want you to --
15 I want you not to deceive the witness, so I was
16 just making a record that what you said is
17 factually untrue, because it is.

18 BY MR. MACGILL:

19 Q So, Ma'am, if we were to -- if you
20 were to click on the report of the independent
21 investigation, where would that take you?

22 A The Task Force website.

1 Q All right. And the Task Force -- all
2 right. Now -- now, ma'am, I want to see if we
3 can't confirm what you did, and those acting in
4 concert with you at Guidepost, once this litigation
5 was started. All right?

6 Are you familiar with the ability to
7 go back historically on websites and determine
8 historically what was offered on a website over
9 time?

10 A No.

11 Q You have not -- did you do any of
12 that yourself in preparation of your testimony?

13 A No.

14 Q Now, you see that -- do you see the
15 page that we have in front of you, the report of
16 the independent investigation in blue?

17 A Uh-huh.

18 Q Now, prior to this particular version
19 that -- we had a witness here, Mr. Klein, was
20 giving testimony -- or attempted to give testimony
21 without being sworn here a minute ago, but let's
22 just talk about reality.

1 Historically, if you click on that
2 blue link right there what happened?

3 What happened --

4 MR. KLEIN: Objection. Asked and
5 answered.

6 THE WITNESS: I have no idea.

7 MR. KLEIN: You can answer again.

8 BY MR. MACGILL:

9 Q Ma'am, the fact of the matter is at
10 the time that you published this report -- strike
11 that.

12 At the time that you completed this
13 report, by going to this SBC investigation and
14 report portion of your website, clicking on that
15 blue reference, quote, report of the independent
16 investigation would take you directly to the
17 Guidepost report, right?

18 MR. KLEIN: Objection.

19 THE WITNESS: No.

20 MR. KLEIN: Asked and answered.

21 BY MR. MACGILL:

22 Q Oh, you're saying that's not a fact,

1 Ma'am?

2 A No.

3 Q And you've done no research to
4 determine what historically existed on your
5 website, have you?

6 A I just know because we never ever
7 linked it to the report. We always linked it to
8 the Task Force website.

9 Q Okay. Now --

10 A If you want to show me something that
11 links it to the report, please do.

12 Q But I want to make sure your --

13 A No, we never did it.

14 Q Okay. I want to make sure you're
15 testifying under oath --

16 A I am.

17 Q Okay. One more question.

18 You are testifying that you are
19 certain, Ma'am, as you sit here today, that this --
20 that you never directly linked to the Guidepost
21 report on your website?

22 A I never linked it directly to the

1 report --

2 Q And you're --

3 A -- on the website.

4 Q And your company never did so?

5 A Not that I'm aware.

6 Q I'm going to -- not that you're
7 aware?

8 A No.

9 Q Are you certain of this or not?

10 A You said did my company, and I'm
11 answering truthfully, not that I'm aware.

12 Q Okay. Now --

13 A If you want to show me that they did
14 it, show me.

15 Q I think you told us that you were in
16 charge of this portion?

17 A I was.

18 Q And did you do it?

19 A I just told you I didn't.

20 Q Now you're saying you're not aware if
21 the company did?

22 A And that's the truth.

1 Q Okay.

2 A If you want to show me, show me.

3 Q Okay. Now, you testified carefully
4 and thoughtfully in relation to this line of
5 questioning that I've just given you, have you not?

6 A I did.

7 Q Okay.

8 A I'm going to need a break because I
9 need --

10 Q Okay. You're welcome --

11 MR. KLEIN: You're --

12 BY MR. MACGILL:

13 Q You're welcome to take break.

14 A Thank you.

15 VIDEOGRAPHER: The time is 4:53 p.m.
16 We are going off the record.

17 (Recess from 4:53 p.m. to 5:11 p.m.)

18 VIDEOGRAPHER: The time is 5:11 p.m.
19 We're going back on the record.

20 Please continue, Counsel.

21 BY MR. MACGILL:

22 Q Ma'am, do you have the deposition

1 notice in front of you still?

2 A No, but I'll get to it.

3 Q Okay.

4 A Okay.

5 Q Topic 12, can you tell us what you
6 did to prepare on Topic 12?

7 A Just a second.

8 MR. KLEIN: And while Ms. Tongring is
9 pulling that up, I will just note our objection to
10 that topic and our offer to limit her answers to
11 that topic, which she will still stand by. And so
12 certainly to the extent you ask questions that are
13 limited by our objection, which is communications
14 just concerning the report relating to Plaintiff,
15 it was a very small limitations as opposed to the
16 entire report, and so with that objection,
17 Mr. MacGill, she is prepared to discuss No. 12, as
18 it relates to the portion of the report relating to
19 the Plaintiff.

20 BY MR. MACGILL:

21 Q So what have you done to prepare to
22 give testimony on behalf of the company on all

1 edits, comments, suggestions, and feedback received
2 from anyone associated with the executive
3 committees, the SBC, the Task Force, and the
4 Cooperation Committee relating to the portion of
5 the report relating to Plaintiff?

6 MR. KLEIN: You can answer that.

7 THE WITNESS: First of all, the
8 only -- we -- we never got any -- the only people
9 who were permitted to see any portions of the
10 report at all, but specifically related to
11 Plaintiff, were the Task Force or the Cooperation
12 Committee. The Executive Committee -- neither the
13 Executive Committee or the SEC received any portion
14 of the report. So I just want to be clear that my
15 answer is limited to the Task Force and the
16 Cooperation Committee.

17 BY MR. MACGILL:

18 Q The Sexual Abuse Task Force?

19 A Correct.

20 Q And the Committee on Cooperation?

21 A Yes.

22 Q Who were the members of the Task

1 Force?

2 A Oh, my goodness. I can name some of
3 them, but it's been a while, so I don't remember
4 all their names.

5 Q Who were the members of the Committee
6 on Cooperation?

7 A Same answer. I don't even know that
8 I ever knew all of their names.

9 Q All right. And what edits or
10 comments, suggestions, feedback did you receive
11 from the Task Force?

12 A There was a document that I believe
13 we had that had like a -- there was like a list of
14 potential comments that they gave us. Everyone was
15 permitted to give, like, factual responses, factual
16 and accuracies, typos, things that related to SBC
17 policy.

18 From the Committee on Cooperation, I
19 don't believe that they had anything that they said
20 that we saw with regard -- that they made with
21 regard to Mr. Hunt. I think the Task Force had one
22 suggestion of a -- a word change, but that was it.

1 Q You testified earlier about some
2 comments that were made in the margins of -- of one
3 of the drafts that was submitted.

4 Do you recall that?

5 A I do.

6 Q And you were -- you indicated that
7 those comments were either your own or perhaps
8 comments of the Committee on -- a member of the
9 Committee on Cooperation. Is that fair?

10 A I did, but then I explained, I
11 believe, in -- in a subsequent answer that those
12 were comments that I typically would write as I was
13 having a discussion with colleagues about them, and
14 that that's what I thought they were and not from
15 the Committee on Cooperation, because many of them
16 were things on the Committee on Cooperation would
17 not have known.

18 Q All right. Looking at Topic 13, you
19 indicated that you -- did you prepare to describe
20 the text messages exchanged or received by
21 Guidepost employees or independent contractors
22 relating to the report?

1 MR. KLEIN: Yeah. And we -- again,
2 we limited it to the gathering of text messages
3 concerning the report -- I'm sorry, about the
4 report concerning Plaintiff. With the limitation,
5 I think she's already testified to this earlier,
6 Rob, about the efforts she made to see that -- how
7 texts were gathered and collected.

8 BY MR. MACGILL:

9 Q And you testified earlier -- so did
10 you -- you described making inquiry of two people
11 about text messages?

12 A I think I said three.

13 Q Three.

14 A Ms. Myers Wood, Ms. Kilpatrick, and
15 Mr. Holske.

16 Q And you asked what they did to
17 produce text messages?

18 A Yes.

19 Q And no one at your company did a
20 forensic collection of text messages. Is that
21 correct?

22 MR. KLEIN: Objection as to form.

1 You can answer.

2 THE WITNESS: No.

3 BY MR. MACGILL:

4 Q No.

5 And you understand what a forensic
6 collection of text messages is?

7 A I do.

8 Q Okay. And you didn't take any steps
9 yourself to do a forensic collection, which would
10 allow you to give specific comments on the full
11 range of text messages exchanged or received by
12 Guidepost employees or independent contractors
13 relating to the report?

14 A I'm sorry?

15 Q You -- no forensic collection by
16 Guidepost of text messages, right?

17 A Right, that's what I said.

18 Q And the only thing that you did is
19 you called people to ask them what they did to get
20 screenshots of text messages they thought were
21 relevant, right?

22 A No. I said, "How did you get

1 them" -- let me back up. What I originally
2 testified to was how did they get their text
3 messages to Mintz & Gold. What we hadn't talked
4 about was the direction of how to collect text
5 messages, which I know was in an e-mail that I had
6 sent to everyone which said, "Go through all of
7 your text messages. Identify ones that are even
8 remotely relevant. Screenshot them and then send
9 them over."

10 So I had given instructions
11 previously as to how to collect them, and that --
12 those were the instructions.

13 Q And did you have a communication with
14 Ms. Wood -- Myers Wood about this?

15 A About how to collect?

16 Q Yes.

17 A Yes.

18 Q About screen shots, this --

19 A She was -- yes, she was on the
20 e-mail.

21 MR. KLEIN: She was on the e-mail?

22 THE WITNESS: On the e-mail.

1 BY MR. MACGILL:

2 Q Did you make inquire of her as to
3 whether she had given to you text message
4 pertaining to the report?

5 A She didn't give them to me, they
6 were -- they were given to her assistant who then
7 got them to IT --

8 Q And --

9 A -- our Guidepost IT.

10 Q -- how did you review the text
11 messages to prepare today?

12 A Oh, I didn't review any text
13 messages.

14 Q Okay. You just simply learned about
15 what had been done to collect them?

16 A Correct.

17 Q And did you understand that you were
18 to give testimony on the text messages that were
19 exchanged or received by Guidepost employees?

20 MR. KLEIN: Well, object to that
21 characterization of 13 -- Request Topic 13.

22 But you can answer.

1 THE WITNESS: No, that's not what
2 I -- are you talking that I should have -- was
3 supposed to review the content?

4 BY MR. MACGILL:

5 Q We were asked -- we asked to get
6 you -- we asked the company to designate a witness
7 to give testimony on the text messages that were
8 exchanged and received by Guidepost employees.
9 You're not prepared to do that today?

10 MR. KLEIN: I would just note the
11 objection. That's not how we interpreted Topic 13,
12 Rob. But you certainly can ask her. But I would
13 just note our objection to, we interpreted, it
14 sounds like, maybe differently than you did. And
15 we did not have a meet and confer to clarify that,
16 but you can ask her questions.

17 THE WITNESS: I'm -- I'm -- no, I did
18 not review any content --

19 BY MR. MACGILL:

20 Q Okay. I want --

21 A -- of text messages.

22 Q I want to review, did you collect any

1 documents to be responsive to Request No. 1?

2 MR. KLEIN: I would just note our
3 objection. We objected to all of the document
4 requests. You're free to ask her every one, Rob,
5 but I will just note for the record that we have
6 objected to the production of each of them. And we
7 were willing -- remain willing to meet and confer
8 on each of them. That meet and confer did not
9 happen, so the witness did not provide any
10 documents today in response. I'm not saying you
11 can't ask her, but I --

12 MR. MACGILL: I promise you that
13 we're going to get to the bottom of this. I
14 promise you. Okay? I'm giving you my word we will
15 resolve all these things, I promise.

16 Now, I just want the witness to
17 testify she has nothing and did nothing.

18 BY MR. MACGILL:

19 Q You didn't bring any documents
20 responsive to Request No. 1, did you?

21 A Correct.

22 Q You didn't bring any documents to --

1 to respond to Request No. 2, did you?

2 A Correct.

3 Q You didn't bring any documents to
4 respond to Request No. 3, did you?

5 A No.

6 Q You didn't bring any documents to
7 respond to Request No. 4, did you?

8 A No.

9 Q You didn't bring any documents to
10 respond to Request No. 5, did you?

11 A No.

12 Q You didn't bring any documents to
13 respond to Request No. 6, did you?

14 A No.

15 Q Okay.

16 MR. KLEIN: I would note that in
17 response to the Request No. 5, the answer is that
18 Guidepost says that no documents exist.

19 MR. MACGILL: Well, that's not true,
20 Counsel, and --

21 MR. KLEIN: Well, I would just say
22 that's what --

1 MR. MACGILL: We --

2 MR. KLEIN: -- that's -- I would just
3 say that's what it says. And I would just say for
4 all the remaining ones, our objections in these
5 responses stand, subject, of course, to
6 Ms. Tongring's --

7 MR. MACGILL: All right. So I'm
8 going to put on the record the way we're going to
9 proceed here, we are -- we ask to meet with
10 Mr. Mintz in Nashville, Tennessee on April 10th at
11 1:00 p.m. to meet and confer on each of these
12 issues that have now arisen.

13 If he's not available to meet and
14 confer at 1:00 p.m. on April 10th in Nashville,
15 we would ask that he appear in Nashville to meet
16 and confer with me at 9:00 a.m. on April 11th.
17 Those are the two dates we will meet and confer.

18 We are going to adjourn the
19 deposition at this time. We've been prejudiced
20 in these proceedings for reasons that we'll talk
21 about later. But April 10th or 11th are the days
22 that we'll meet with Mr. Mintz and get to the

1 bottom of these things. And we'll see what we
2 can resolve. But we are not ending this
3 deposition today.

4 Second, we have been prejudiced in
5 our ability to conduct the individual deposition
6 of Ms. Tongring. And we will not proceed
7 tomorrow. And we will meet and confer with
8 Mr. Mintz on either of those dates. We're hoping
9 either date works. And we'll be asking for a
10 remedy in relation to that.

11 MR. KLEIN: Well, I would just note
12 for the record that this deposition is ending now.
13 From our position -- again, it's just our position,
14 Rob, and you've laid your position out there, our
15 position is that this deposition is finished.

16 We gave you an opportunity in our
17 e-mails to postpone this. I specifically asked
18 if you wanted to, no problem. You did not
19 respond to that e-mail, you choose to wait and to
20 sandbag us here after we had made arrangements to
21 be here and be prepared to testify on the topics
22 we had tried to agree with, and all the testimony

1 she provided. So we will not be appearing again
2 without court order on behalf of -- Ms. Tongring
3 will not on behalf of the corporate
4 representative. We remain willing to testify
5 tomorrow. There were no issues with topics with
6 regard to tomorrow's individual deposition, so I
7 would ask for the basis for canceling or
8 postponing tomorrow's deposition, since the
9 topics have nothing to do with that.

10 MR. MACGILL: You defaulted on a --
11 defaulted on every topic. Completely false, with a
12 minor exception on Topic No. 7, completely false.
13 You didn't do even the most basic thing on
14 anything. You parsed and edited every request.
15 You didn't produce a single document.

16 We came here thinking that you were
17 not serious, you couldn't be serious, that no
18 lawyer could be serious about not producing a
19 single document in relation to our request for
20 Nos. 1 through 6. No one could take such a
21 position. You did.

22 So we're not going to be -- we're

1 not going to be dealt with this way. So what
2 we're going to do is exactly what I said,
3 Mr. Mintz needs to be in Nashville, Tennessee, as
4 we requested. If he can't be in Nashville,
5 Tennessee on those dates, he needs to tell us
6 when he can be. And we will meet and confer.
7 We're not going to file any motions with the
8 court. We're going to meet with Mr. Mintz and
9 see if we can't resolve all these things. You
10 reserve your rights and we're reserving every one
11 of ours.

12 MR. KLEIN: I understand that, but I
13 wish this conversation had been all similar to the
14 pleasant conversation we had on the phone last
15 Monday, which, of course, I guess I should not be
16 surprised is completely different from that
17 conversation. I wish we had -- you had treated me
18 today as you tried to treat us then. The problem
19 is you don't do that, so we are left in the
20 position that we have to now fight about things
21 that are unnecessary to fight about.

22 And so are your now -- you're now

1 canceling the individual deposition of
2 Ms. Tongring that has nothing to do with the
3 topics?

4 MR. MACGILL: It has everything to do
5 with it. Her deposition depends on those documents
6 being produced. That's why we put the sequence in
7 that we did. We put a sequence of a specific four
8 hours today, six requests for production that would
9 inform her personal deposition. That's why we did
10 it.

11 MR. KLEIN: Well, you were aware --
12 Rob, you were aware -- crystal clear that we were
13 providing documents. We then gave you the
14 opportunity to then postpone this deposition to
15 have this issue. You made your choice. You cannot
16 make your choice to continue with the deposition
17 and then say, "Okay. Now I'm done until I choose
18 to open it up again." That's not how it works. So
19 your feign surprise that we're not providing
20 documents that you knew we were not providing will
21 not work. And the record will reflect it.

22 And so we have our --

1 MR. MACGILL: We --

2 MR. KLEIN: -- positions. So we're
3 not going forward tomorrow?

4 MR. MACGILL: We are not going
5 forward tomorrow. And we would ask you to confirm
6 as soon as possible that Mr. Mintz will appear in
7 Nashville, Tennessee on either of these dates. If
8 he can't appear on those dates, we need to know
9 when he can get to Nashville. And we're going to
10 see if we can't iron all these things out with him.

11 MR. KLEIN: And there's no desire on
12 your part, even though you had the desire on the
13 phone call with me, there is no desire on your part
14 to have a phone call to try to sort these out, as
15 you and I had spoken on the phone about to not
16 avoid meeting in person -- not to not avoid, to
17 avoid meeting in person, you and I had a discussion
18 let's try to work it out over the phone. You
19 provided some opportunities that then you -- your
20 team could not make.

21 Are you now saying that you do not
22 want to even try to attempt to meet and confer

1 over a video or a phone and instead have now
2 changed your course and only want to meet in
3 person, just so I understand your position?

4 MR. MACGILL: We did everything we
5 could to meet with you ahead of time.

6 MR. KLEIN: Not true.

7 MR. MACGILL: Hold on.

8 MR. KLEIN: Completely untrue. And
9 the record will reflect that. But answer my
10 question. Are you now not willing to at least try
11 to meet over video or over the phone or do you
12 insist on only having in person, which is different
13 than what you said to me?

14 MR. MACGILL: Let me explain our
15 view.

16 MR. KLEIN: That's fine.

17 MR. MACGILL: You have played us from
18 the beginning of last week until today, you played
19 us. We assumed that you would act in good faith,
20 and you did nothing to act in good faith. I called
21 you on the 10th to resolve things in an amicable
22 way.

1 We -- you had to take a plane on
2 Friday afternoon. I was on a plane Friday
3 morning. We did everything we could to get a
4 time set with you Friday afternoon. And the
5 e-mails confirm that. We again offered Monday as
6 a way to try to resolve some of these issues and
7 you unilaterally said, "We're not talking to
8 you." That's what you said on Monday.

9 So we got played. We won't have
10 this happen again. We are insisting upon a
11 personal meeting with Mr. Mintz. I want to meet
12 with him one on one as the court directed.
13 That's what we're going to do. The magistrate
14 judge said specifically this is the way it's
15 going to happen. And that's what we're going to
16 do. He told us what to do. I was hoping that we
17 could avoid this, but we can't.

18 MR. KLEIN: You were not hoping. You
19 were -- you were hoping this would happen, Rob,
20 that's the problem.

21 MR. MACGILL: No.

22 MR. KLEIN: The problem is you wanted

1 this to happen exactly as it did. The good news is
2 you forgotten the e-mails I sent on Monday and
3 Wednesday. Those e-mails will record the efforts
4 we made. And the good news is I have the written
5 record. Thank you for your time.

6 I just want to see actually before
7 we close the record to see if Counsel for the EC
8 wants to ask the witness any questions. I just
9 noticed a hand go up, so I did not want to ignore
10 that.

11 MR. OTCHY: Ms. Callas will be asking
12 questions. I just want to note for the record we
13 made non-refundable travel arrangements to be here
14 today and tomorrow for the deposition, which has
15 now been unilaterally canceled upon less than eight
16 hours' notice, this was similar to the situation
17 where a prior deposition was canceled during the
18 first week of deposition, and the EC will reserve
19 its rights with respect to seeking reimbursement
20 for the fees.

21 MS. CALLAS: And if I might --

22 THE WITNESS: Yeah, and I'm sorry, I

1 closed out of the session, if you need any
2 documents.

3 MS. CALLAS: No, I don't need any
4 documents.

5 THE WITNESS: Okay.

6 EXAMINATION BY COUNSEL FOR SBC EXECUTIVE COMMITTEE
7 BY MS. CALLAS:

8 Q I just want to go back over and ask
9 you a few additional questions.

10 A Okay.

11 Q So my name is Gretchen Callas, and
12 I'm counsel for the Executive Committee.

13 I just want to be clear based on your
14 prior testimony that it is correct that the
15 Executive Committee was not shown a copy of the
16 report prior to its final issuance. Is that
17 correct?

18 A Yes.

19 Q And it is correct that the Executive
20 Committee was not given an opportunity to edit,
21 comment or offer any feedback on the report prior
22 to its final issuance. Is that correct?

1 A Yes.

2 Q You were asked a couple of questions
3 about Dr. Frank, and I just want to be clear that
4 as far as you know today, he did not receive a
5 separate copy of the Hunt portion prior to the
6 final issuance of the report. Is that right?

7 A Not that I recall.

8 Q You were asked about edits, comments,
9 changes by the Committee on Cooperation. And is it
10 correct that you do not recall any by that
11 committee, correct?

12 A To the Dr. Hunt portion?

13 Q To the Hunt portion, yes.

14 A No.

15 Q And you testified that you believe
16 there may have been a single word that was proposed
17 by the Task Force on the Hunt section. Is that
18 right?

19 A Yes, I believe so.

20 Q And is it true that the Guidepost
21 held the final authority and decision whether to
22 accept that proposed change over a single word. Is

1 that right?

2 A Yes, we did.

3 Q Okay. Do you know if it was accepted
4 or not?

5 A No, I believe we accepted it.

6 Q But at the end of the day, the
7 decision was Guidepost's whether to accept that
8 proposed change. Is that right?

9 A Yes.

10 Q As it relates to the scope of the
11 engagement, was it Guidepost's decision whether
12 Dr. Hunt's -- the section on Dr. Hunt fell within
13 the scope of the engagement?

14 A Yes.

15 MS. CALLAS: That's all the questions
16 that I have.

17 MR. KLEIN: Nothing. Thank you.

18 MR. MACGILL: So I've got some
19 followup. First, we have incurred multiple fees
20 and expenses because of your cancelation at the
21 last minute. And we reserve all our rights as
22 well. You've canceled depositions without notice,

1 including Pastor Johnny Hunt, without any adequate
2 notice. And we haven't heard expense prejudice,
3 and we've had the same expense prejudice from
4 Guidepost of a similar nature relatedly.

5 EXAMINATION BY COUNSEL FOR PLAINTIFF

6 BY MR. MACGILL:

7 Q Just to followup on Counsel's
8 questions.

9 Who hired Guidepost?

10 A I'm sorry, I'm trying to picture the
11 engagement letter in my head. And I apologize that
12 I -- I logged out of the --

13 Q All right. I'm going to -- it's
14 Exhibit 2. I'll read it to you.

15 A Okay. Thank you.

16 Q Exhibit 2 is a letter to Mr. Bruce
17 Frank.

18 A Uh-huh.

19 Q And do you understand that Dr. -- I
20 said mister. It's Dr. Bruce Frank. Do you
21 understand that he's a member of the Executive
22 Committee of the Southern Baptist Convention?

1 A No, I don't believe he was. He was a
2 pastor of a church. He was the chairman -- or the
3 chair of the Sexual Abuse Task Force. I believe
4 that the Executive Committee hired us, but we
5 reported directly to the Task Force.

6 Q Okay. Ma'am --

7 A Because the Executive Committee was
8 paying for -- paying -- the funds had to come out
9 of the Executive Committee.

10 Q Take a look -- do you have the --

11 A No, I'm not --

12 MR. KLEIN: Patrick, can you --

13 THE WITNESS: I'm really, really
14 sorry.

15 MR. KLEIN: That's okay.

16 I'm sorry, Patrick, if you don't
17 mind helping her in getting to hers or you can
18 show her Rob's. Whatever you want to do.

19 THE WITNESS: I'm so sorry.

20 MR. SANDERS: You're fine.

21 THE WITNESS: Yeah, like I fully
22 logged out.

1 MR. OTCHY: I can give her mine.

2 THE WITNESS: Yeah, why don't --

3 MR. KLEIN: Yeah, that would be --

4 THE WITNESS: I'm sorry.

5 MR. KLEIN: -- great. We don't need
6 to waste the time. Yeah, yeah, yeah.

7 THE WITNESS: Okay.

8 BY MR. MACGILL:

9 Q All right. So looking at the
10 engagement letter, do you have this engagement
11 letter in front of you now?

12 A Yes, I do.

13 Q And this is the engagement letter
14 that provided the scope and details of the
15 engagement by Guidepost. Is that correct?

16 A Uh-huh. Yes.

17 Q And who signed this letter on behalf
18 of Guidepost?

19 A I believe it will be Julie Myers
20 Wood.

21 Q Would you take a look --

22 A I am. I am.

1 Q -- and see? It's the last page.

2 A Just a second. My copy is unsigned,
3 but I know that it -- it says "Julie," and I know
4 that Julie Myers Wood signed it.

5 Q Okay. And if you look at page 10 of
6 11.

7 A Oh, yes, that's signed. That one is
8 signed, yeah. Sorry.

9 Q And you see that it's signed by Julie
10 Myers Wood. Is that correct?

11 A Yes.

12 Q And it was agreed and accepted to by
13 Dr. Bruce Frank. Is that right?

14 A That's correct.

15 Q All right. Now, if you look at page
16 1 of this engagement --

17 A Oh, can I -- can I say one thing?
18 I'm sorry. This copy doesn't have Pastor Slade's
19 signature. But Pastor Slade did sign on a separate
20 copy, I know, and I've seen his signature. So it
21 is also signed by Pastor Slade.

22 Q Look at page 11 of 11.

1 A Oh, sorry. I didn't mean to get
2 ahead of you.

3 Q Do you see Mr. -- do you see Pastor
4 Rolland Slade signing?

5 A Yes, there it is.

6 Q Okay. Now -- and he signed as the --
7 on behalf of the Executive Committee, did he not?

8 A Yes, I believe so.

9 Q All right. And to be as specific, if
10 we could for just a minute, if you look at page
11 1 --

12 A Yes.

13 Q -- of this October 5 engagement
14 letter, tell the court and jury who it's addressed
15 to.

16 A Dr. Frank and Pastor Slade.

17 Q And Dr. Frank at the time of this
18 letter was the Task Force Chair of the Southern
19 Baptist Convention. Is that right?

20 A Yes.

21 Q And Pastor Rolland Slade was the --
22 on the Executive Committee of the Southern Baptist

1 Convention. Is that right?

2 A Yes.

3 Q And the engagement in Section 1.1
4 says that, "In accordance with the mandate given by
5 the Southern Baptist Convention Messengers (SBC
6 motion) the SBC, through and under leadership of
7 the Task Force has retained Guidepost Solutions and
8 its agents."

9 Do you see that?

10 A I do.

11 Q And "To conclude" -- or, I mean, "To
12 conduct an independent investigation of the
13 Executive Committee and an audit of the procedures
14 and actions of the Credentials Committee under the
15 terms and conditions set forth in this engagement."
16 Is that right?

17 A That's what it says.

18 Q All right. And it says, "Our client
19 in this matter will be the Task Force of the SBC."

20 Do you see that?

21 A I do.

22 Q Okay. Section 2.2, "The Committee on

1 Cooperation of the Executive Committee will be
2 headed by the president of the SBC, who will be
3 also -- who also -- who will also be a member of
4 the committee."

5 Do you see that?

6 A I do.

7 Q Is that your understanding that the
8 Committee on Cooperation of the Executive Committee
9 was going to be, in fact, headed by the president
10 of the SBC?

11 A Yes.

12 Q All right. And so when the
13 cooperation -- when the Committee on Cooperation
14 was pulled for its comments, did you understand
15 that the Committee on Cooperation included
16 members -- a member or members of the Executive
17 Committee?

18 A Yes.

19 Q And specifically it says exactly the
20 following, "The remaining four members will be
21 members of the Executive Committee who were
22 appointed to their first term on the Executive

1 Committee in 2021," is that right?

2 A Yes.

3 Q So the Committee on Cooperation
4 included at least these four members of the
5 Executive Committee. Is that right?

6 A Yes.

7 Q So when you transmitted this report
8 to the Committee on Cooperation -- pardon me.

9 When you transmitted this report
10 twice to the Committee on Cooperation, you were
11 transmitting to a committee that included at least
12 four members who were members of the Executive
13 Committee. Is that fair?

14 A When we showed them the report.

15 Q When you showed them the report?

16 A Yes.

17 Q Right.

18 By video or Zoom. Is that right?

19 A Well, the first time it was in
20 person.

21 Q With paper?

22 A Right.

1 Q And the second time was --

2 A It was over Zoom, yes.

3 Q And each time you displayed to the
4 Committee on Cooperation, you displayed to a
5 Committee on Cooperation in paper form in person or
6 by Zoom or other -- other -- Teams or whatever --

7 A Yeah, I think --

8 Q -- it was, you displayed to them this
9 Committee on Cooperation, which in each instance
10 included four members of the Executive Committee of
11 the SBC?

12 A Yes.

13 Q All right. Now, at the time that
14 you -- do you recall -- now that we're looking into
15 the actual details of what happened, do you recall
16 who the -- what the names were of the gentlemen who
17 served on the -- who served on the Cooperation
18 Committee?

19 A So I remember Dr. Lynn was definitely
20 one of them. I remember John or Joe Batts, because
21 he was the one who was out in Seattle who couldn't
22 come to Nashville the one time, but I don't -- and

1 I know that there was a woman, but I don't -- I'm
2 sorry, I don't recall everyone's name.

3 Q Now, did you understand also that the
4 Committee on Cooperation had a responsibility to
5 ensure that the Executive Committee fulfilled its
6 fiduciary obligations to the SBC?

7 MR. KLEIN: Objection as to form.
8 Calls for a legal conclusion.

9 You can answer.

10 THE WITNESS: No.

11 BY MR. MACGILL:

12 Q All right. Let's look together at
13 2.3 then, the next page.

14 A Okay.

15 Q Let's read it together. "The
16 Committee on Cooperation" -- are you there?

17 A I do.

18 Q "The Committee on Cooperation will
19 ensure that the Executive Committee fulfills its
20 fiduciary obligations of the SBC and the
21 Messengers."

22 Do you see that?

1 A I do.

2 Q "And specifically the Committee is
3 charged with the following:" And then there's a
4 list of four bullet points. Do you see that?

5 A Yes.

6 Q Okay. Looking now at this report
7 that you were -- or the engagement that you were
8 asked about by counsel for the SBC, and looking at
9 Section 3.1, do you see specifically that in
10 Section 3.1, that there's -- the -- the Guidepost
11 was to investigate what is delineated here in five
12 bullet points?

13 MS. CALLAS: Object to the form. I'm
14 not counsel for the SBC.

15 MR. MACGILL: My mistake.

16 BY MR. MACGILL:

17 Q In response to Counsel for --
18 questions from Counsel for the SBC Executive
19 Committee a few minutes ago, I want to bring
20 further detail into focus on your Section 3.1.

21 A Yes.

22 Q Are you there?

1 A I'm seeing it.

2 Q And Section 3.1 includes reference to
3 the scope of what Guidepost will, quote,
4 investigate, unquote, right?

5 A Yes.

6 Q Allegations of abuse by Executive
7 Committee members. Is that right?

8 A Yes.

9 Q And then second, and there was
10 testimony that you gave in my examination today
11 about abuse allegations by Executive Committee
12 members.

13 Do you remember that line of
14 testimony, generally speaking?

15 MR. KLEIN: Objection as to form.

16 You can answer.

17 BY MR. MACGILL:

18 Q Do you recall that general testimony?

19 A Allegations of abuse by Executive
20 Committee members, yes.

21 Q And then here, looking now at the
22 engagement letter, "Mishandling of abuse

1 allegations by Executive Committee members between
2 January 1, 2000 to June 14, 2021."

3 Do you see that?

4 A I do.

5 Q And that's the period of time for
6 which mishandling of abuse allegations was to be
7 focused. Is that right?

8 A The mishandling of abuse, yes.

9 Q Okay. And then continuing, Bullet 3,
10 allegations of mistreatment of sexual abuse victims
11 by Executive Committee members from that same
12 period of time. Is that right?

13 A Yes.

14 Q You reviewed the invoices prior to
15 their -- when they were sent. Do you recall that
16 testimony?

17 A Yes.

18 Q And who did you direct the invoices
19 to?

20 A I believe they went to Pastor Slade.

21 Q And Pastor Rolland Slade is a
22 member -- is he one of the addressees here, that is

1 he is part of the SBC Executive Committee?

2 MR. KLEIN: When you say "here," are
3 you still referring to the engagement letter?

4 BY MR. MACGILL:

5 Q The first page.

6 A I'm going to up to --

7 MR. KLEIN: Yeah, first page.

8 THE WITNESS: There we go. Yes.

9 BY MR. MACGILL:

10 Q All right. And your best
11 recollection is that you sent the invoices here to
12 the Executive Committee, specifically Pastor
13 Rolland Slade. Is that right?

14 A Yes --

15 Q All right.

16 A -- because the Task Force didn't have
17 any funding. The only way that -- the only funding
18 was through the Executive Committee.

19 Q So it's the SBC Executive Committee
20 that paid Guidepost?

21 A That's correct.

22 MR. MACGILL: That's all I have,

1 Ma'am. Thank you.

2 MR. KLEIN: I'm just going to reserve
3 our rights about tomorrow's deposition. We're
4 prepared to go forward. I don't need to restate
5 for the record, but we are prepared to go forward
6 tomorrow. We reserve all our rights regarding
7 Ms. Tongring's individual deposition.

8 Thank you everyone your time.

9 MR. MACGILL: Thank you.

10 VIDEOGRAPHER: The time is 5:43 p.m.
11 We are going off the record.

12 (Whereupon, at 5:43 p.m. the videotaped
13 deposition of KRISTA TONGRING was
14 concluded for the day; signature
15 reserved.)
16
17
18
19
20
21
22

CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom the foregoing videotaped deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



FELICIA A. NEWLAND, CSR

Notary Public

My commission expires:

September 15, 2024

Veritext Legal Solutions

1100 Superior Ave

Suite 1820

Cleveland, Ohio 44114

Phone: 216-523-1313

April 8, 2024

To: Scott Klein, Esq.

Case Name: Hunt, Johnny M. v. Southern Baptist Convention; Et Al.

Veritext Reference Number: 6592913

Witness: Krista Tongring , 30(b)(6) Deposition Date:
3/20/2024

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness

review the transcript and note any changes or corrections on the

included errata sheet, indicating the page, line number, change, and

the reason for the change. Have the witness' signature notarized and

forward the completed page(s) back to us at the Production address
shown

above, or email to production-midwest@veritext.com.

If the errata is not returned within thirty days of your receipt of
this letter, the reading and signing will be deemed waived.

Sincerely,

Production Department

NO NOTARY REQUIRED IN CA

Veritext Legal Solutions

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6592913

CASE NAME: Hunt, Johnny M. v. Southern Baptist Convention;
Et Al.

DATE OF DEPOSITION: 3/20/2024

WITNESS' NAME: Krista Tongring , 30(b)(6)

In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
my testimony or it has been read to me.

I have made no changes to the testimony
as transcribed by the court reporter.

Date Krista Tongring , 30(b)(6)

Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
and acknowledge that:

They have read the transcript;

They signed the foregoing Sworn
Statement; and

Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal

this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6592913

CASE NAME: Hunt, Johnny M. v. Southern Baptist Convention;
Et Al.

DATE OF DEPOSITION: 3/20/2024

WITNESS' NAME: Krista Tongring , 30(b)(6)

In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
my testimony or it has been read to me.

I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
well as the reason(s) for the change(s).

I request that these changes be entered
as part of the record of my testimony.

I have executed the Errata Sheet, as well
as this Certificate, and request and authorize
that both be appended to the transcript of my
testimony and be incorporated therein.

Date

Krista Tongring , 30(b)(6)

Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
and acknowledge that:

They have read the transcript;

They have listed all of their corrections
in the appended Errata Sheet;

They signed the foregoing Sworn
Statement; and

Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal
this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
ASSIGNMENT NO: 6592913

PAGE/LINE(S) / CHANGE /REASON

Date Krista Tongring , 30(b)(6)
SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
DAY OF _____, 20_____ .

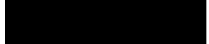
Notary Public

Commission Expiration Date

&	106 5:9 16:17	11th 76:1 79:19	154:1 160:1
& 3:11,19 7:13 245:3	16:18 17:16,20 22:18 193:2	81:11 82:3 250:16,21	169:19
0	107 5:10	12 40:19 52:7	14 162:17
00243 1:6 6:19	123:16,18	52:22 53:15,20	169:2 172:5,5
003968 5:10	125:4,18	55:1 56:2	183:8 274:2
012582 5:13	127:10 130:2	57:22 66:17,18	14754 277:19
013490 5:12	138:2,4 141:12	82:1,17 86:19	15 277:22
016152 5:14	142:4	87:18 93:6	155 139:3
1	108 5:11	95:2 107:2	156 2:7
1 6:12 13:17	158:11,14	151:19 239:5,6	158 5:11
25:5,14 31:1	109 5:12	239:17	15:25 156:16
42:10 66:3,4	160:20 161:2	1200 2:8	15th 145:15
77:19 138:2,4	165:19 168:22	123 5:10	16 5:9,11
151:12 169:2	10th 140:5	1250 1:14,21	160 5:12
172:4 193:2	250:10,14,21	6:21	1600 2:18 3:4
248:1,20	256:21	12595 5:13	16155 5:14
252:20 265:16	11 66:13 67:5	12th 149:17	16th 145:15
266:11 274:2	67:12 68:3	150:5 151:2	171 5:13
1,200 118:18	70:7 71:20	152:1 153:22	1746 71:13
119:17,22	72:21 73:12	156:5,16 158:4	18 154:19,20,22
120:19 121:19	76:11 77:15	158:18	155:3,13
1,300 118:17,18	81:3 265:6,22	13 148:5	1820 278:2
119:17,22	265:22	150:13 158:10	187 5:14
120:22 121:20	110 5:13	160:15 169:3	1993 13:6
1.1 267:3	171:20 172:2	242:18 246:21	1996 13:9
10 138:14,21	183:6	246:21 247:11	1:00 250:11,14
139:4,11	1100 278:1	130 171:19	1:05 1:13 6:4
143:10 144:15	111 5:14 187:2	13490 169:2	2
159:17 265:5	187:4	13492 161:18	2 12:15,15,18
10016 3:14	112 5:15 132:1	13503 5:12	13:18 25:14
105 5:8 9:9,10	132:18 208:9	13th 145:10,11	66:11 69:16
9:13 10:10	208:12	148:9 149:17	116:13 138:10
14:9 15:14	113 5:16 139:3	150:5,14	151:13 187:14
	141:6 232:6,9	152:12 153:16	188:13 193:3
			249:1 262:14

262:16 2.2 267:22 2.3 271:13 20 1:12 121:4 137:11 211:10 279:16 280:22 281:22 2000 274:2 20005 1:15,21 6:22 2010 144:4 2017 13:15 2018 144:4 2020 121:17 143:10 215:7 217:18 2021 121:5,22 269:1 274:2 2022 42:12 47:14 76:1,11 77:15 79:19 81:3 82:3 85:3 108:20 117:15 117:19 118:9 119:20,20 120:9 123:2 125:14 129:22 137:11 138:14 138:21 139:4 139:11 144:15 148:5,9 150:14 152:2 156:16 160:1,15 189:22 190:9 190:13 211:12	222:4 225:3 226:6 230:8 2023 15:15 118:21 119:16 215:7 2024 1:12 6:5 217:18 277:22 278:4 208 5:15 20th 6:5 21 15:15 83:9 216-523-1313 278:3 232 5:16 25 117:20,22 120:8 121:13 121:18,19,20 25322 2:19 259 5:4 262 5:5 26th 124:2 125:14 129:22 137:11 28 71:13 2908 3:20 2:18 93:20,22 2:33 93:22 94:1 2nd 3:13 3 3 151:16 162:17 218:8 249:4 274:9 3.1 272:9,10 273:2	3.1. 272:20 3/20/2024 278:8 279:3 280:3 30 1:10 6:13 7:16 24:4 33:7 33:15 153:6 154:5 180:18 182:15 190:8 190:13 219:7 219:21 278:8 279:4,9 280:4 280:13 281:20 300 120:10,19 121:19 30th 189:19 31 42:12 314 165:20 325 120:10,22 121:20 350 1:21 37203 3:6,21 3971 5:10 3:23 1:6 6:19 3:33 165:11,13 3:48 165:13,14 3rd 189:22 4 4 126:4 151:13 187:14 188:13 216:3 217:10 249:7 44114 278:2 46204 2:9	490 168:22 493 167:5 4:53 238:15,17 5 5 12:18 132:21 215:5,17,20 249:10,17 266:13 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] 7 53 43:7 174:15 587 183:8 5:11 238:17,18 5:18 172:6 5:43 1:13 276:10,12 6 6 1:10 6:13 7:16 24:4 33:7 33:15 75:5,7 75:10 85:4 153:6 154:5 180:18 182:15 183:8 219:7,21 249:13 252:20 278:8 279:4,9 280:4,13 281:20 600 3:12 6592913 278:7 279:2 280:2
---	--	--	---

281:2 66 130:19 131:18 67 159:21,21 6:40 158:18	a	acceptable 173:12 accepted 177:16,21 261:3,5 265:12 accepting 135:3 136:8 access 23:5,9 66:5 147:15 207:6 210:8 212:13,18 233:9 accordance 267:4 279:5 280:5 accounting 113:1 accuracies 241:16 accuracy 177:4 177:13,22 accurate 103:17 105:3,9 105:10 129:1 204:18 accurately 127:12 139:17 acknowledge 279:11 280:16 act 256:19,20 279:14 280:20 acted 180:13 acting 158:3 234:3	action 277:11 277:16 actions 228:5 267:14 actual 18:3 32:2 67:16 86:13 123:8 146:22 188:11 192:17 270:15 actually 18:3 29:11 66:17 90:15 210:16 258:6 add 113:20 added 149:5,6 149:8 addition 33:22 43:19 50:16 additional 177:5 259:9 address 55:9 58:18 232:18 278:14 addressed 100:3 266:14 addressees 274:22 addressing 62:11 adequate 262:1 adjourn 250:18 administration 16:3 administrative 110:16 119:7
7	able 33:12		
7 41:22 200:6,7 200:12,17 203:16,18 204:4 210:15 252:12 700 3:5 7:56 169:3	79:14 125:18 147:11 218:11 above 232:18 278:16 absolutely 56:8 194:17 abuse 36:8 77:9 77:16 78:8,17 80:13 88:5 123:1 124:1 125:11 134:11 134:21 135:18 136:20 137:13 139:8 140:14 141:14,18 142:21 144:16 153:2 163:14 166:2 181:21 186:5,17 188:8 205:13,15 206:16 214:3 228:4 230:10 231:2 240:18 263:3 273:6,11 273:19,22 274:6,8,10 accept 135:7 136:10 139:15 260:22 261:7		
8			
8 5:3 25:14 151:14 155:6,7 192:22 193:6 193:19,22 278:4 850 109:22 8a 199:9 8b 199:18			
9			
9 5:8 83:22 84:13 85:4 219:1,2,15 900 1:15 901 6:21 96 168:21 9:00 250:16 9:15 83:7,13 169:19			

admit 29:17 108:8,9 137:9 139:10 admitted 30:2 34:11 advance 60:22 62:10 188:7 advanced 63:18 advertised 227:21 advertising 201:19 214:17 226:3,4 227:10 advise 17:21 affiliations 7:7 affirm 80:22 affixed 279:15 280:21 afternoon 6:3 7:12 197:19 257:2,4 agents 267:8 ago 27:4 29:3 50:10 106:11 106:15 107:2 107:10 110:22 211:4 234:21 272:19 agree 6:10 115:16 128:14 135:1 137:16 174:22 215:10 215:10 251:22	agreed 37:15 38:21 115:7,11 115:18,18 123:8 134:19 195:18 199:2 199:12,22 200:9 201:12 201:12 202:1 202:19 203:1,4 205:17 215:9 216:17 217:20 265:12 agreement 203:1,5,8,9,9 203:10 agreements 115:13,14 ahead 45:14 61:12 63:9 85:17 93:17 156:1 163:11 256:5 266:2 airport 197:22 al 6:16 278:6 279:3 280:3 alex 3:10 7:13 alias 42:11  allegation 34:6 52:8 53:1,20 55:1 69:19 77:8,16 80:13 82:1,5,18 86:20 95:2 101:12,21	allegations 29:20 30:7 31:5 32:6,11 32:14,18 33:3 33:8 36:5 37:21 38:9 39:6 40:17,18 43:9 51:13 55:7 57:18 63:16 72:12,22 73:9 78:7 81:2 85:22 86:4 92:6,16,20 94:20 96:3,22 99:7 134:11,20 135:18 136:20 137:13 139:8 140:14 141:18 142:21 144:16 148:10 151:22 152:16 153:2 160:15 163:14 166:2 228:5 273:6,11,19 274:1,6,10 alleged 80:13 89:17 90:21 91:6,22 165:2 166:19 191:22 allow 54:2 153:8 209:19 244:10 allowed 143:21 ambush 60:2 60:12	amend 59:1,2,5 amended 5:9 17:6 amicable 256:21 amount 188:11 analysis 94:18 anderson 4:8 announced 230:11 answer 18:5 21:18 24:4 26:3,7 27:10 28:10,19,21 29:9 30:5 33:12,13 34:8 35:6,18 36:12 37:12 38:2,14 39:14 40:4,12 41:1,10 43:12 44:2 45:3,4,18 45:19,22 46:2 46:4,12,13 47:3,20 48:13 49:7 50:3 51:5 51:7 52:12 53:4 54:2,4,16 55:13 56:14 57:7,13 58:4 58:12 60:9,10 60:15 61:4,22 62:16 63:7,22 65:3,15 68:13 68:20 69:10 72:16 73:3,19
---	--	---	--

77:22 79:6 80:17 81:6,17 82:9,22 84:5 84:17 85:7 88:22 91:14 92:10,22 96:13 97:2,11,13 98:20 99:15,20 100:8 101:14 102:2,18 103:10,17 104:15 105:1,8 105:16,16 106:6,17 107:5 108:5,16,22 109:21 110:7 110:14 111:4 111:14,17 112:6,20 113:6 113:15 114:1,8 114:21 115:8 116:3,9 117:7 117:18 118:6 118:12 119:2 120:3,13 121:9 124:10 128:9 130:4,14 132:9 139:22 140:21 142:1,6 143:18 144:19 145:21 147:6,19 148:2 148:18 149:11 149:21 150:21 152:8 153:8,8 153:11 154:4,6	154:14 156:22 157:8,17,19 159:3 164:19 165:6 166:11 166:21 170:3 170:22 174:18 175:12 176:14 177:1,20 178:16 179:18 180:4,18 181:11 184:19 185:17 186:2 186:13,14 188:18 189:12 190:18 193:14 195:17 199:3 199:14 200:2 200:19 201:14 202:2,11,17,20 203:21 206:14 207:3,10 210:7 210:20 213:6 215:12,19 216:8,19 217:14 218:10 219:10,11,16 219:18 222:14 226:10 227:4 227:15 228:11 228:15,16,17 228:18 229:10 235:7 240:6,15 241:7 242:11 244:1 246:22 249:17 256:9	271:9 273:16 answered 25:20 40:3 48:12 50:2 52:10 53:3 54:1 70:5,10 81:5 82:9 91:13 92:9 96:12 120:2 130:13 150:19 157:17 166:10 176:13,22 177:19 188:16 206:13 207:2,9 214:20 217:12 222:13 227:3 235:5,20 answering 195:20 237:11 answers 30:2 71:10,14 75:21 96:15 97:4,16 239:10 anthony 31:22 anybody 54:12 73:16 96:18 205:18 apologies 32:12 42:16 apologize 76:8 85:12 89:1 262:11 appear 250:15 255:6,8 279:11 280:15	appearance 187:17 appearances 7:6 appeared 131:1 appearing 4:4 8:22 252:1 appears 11:11 11:13,16,21 12:1 83:2 213:1,9 277:5 appended 280:11,18 applied 180:6 appointed 268:22 apprised 30:13 appropriate 30:22 87:17 174:13 approve 113:18 124:4 approved 112:22 124:13 approximately 19:22 110:3 112:2 115:3 116:12 118:1,9 118:21 119:17 119:21 120:8 121:15,19,20 april 123:2 124:2 125:14 129:22 137:11 137:11 250:10
--	--	--	---

250:14,16,21 278:4 arant 2:16 3:3 area 131:6 224:9,12,21 225:2,21 argue 196:22 argument 102:3 argumentative 28:9,18 53:3 68:19 69:9 106:5 154:3 209:18 arguments 101:20 arisen 250:12 arrangements 251:20 258:13 article 191:6,8 191:14 aside 213:13 asked 26:9,15 27:3,10,11,12 27:15 34:20 40:2 48:11 50:1 52:9 53:3 53:22 59:17 81:4 82:8 91:12 92:8 96:12 120:1 130:12 150:18 157:16 162:5 163:13 166:2,9 173:21 176:12	176:21 177:6 177:18 188:15 195:10 198:1 198:17 206:12 207:1,9 214:19 217:11 222:12 227:2 228:15 229:3 235:4,20 243:16 247:5,5 247:6 251:17 260:2,8 272:8 asking 25:14,15 49:1 88:17 124:6 179:6 180:17 182:5,8 209:20 251:9 258:11 aspect 11:8 assault 81:19 165:3 166:19 186:10,17 191:22 assessment 37:15 38:21 assignment 279:2 280:2 281:2 assist 16:7 assistance 159:11 161:5 assistant 246:6 assisting 15:5 associated 13:20 72:22 151:22 201:21	202:8 204:12 220:4 240:2 assume 100:20 170:5 assumed 206:17 256:19 assumes 48:12 assuming 206:15 assumption 139:19 attached 21:12 21:13,15 170:5 280:7 attachment 170:16 attachments 170:10 attempt 186:15 186:18 255:22 attempted 234:20 attempting 164:15 186:8 attended 13:11 13:14 attention 187:17 191:2 attentive 178:21 attorney 7:8 277:14 attorney's 42:18	attorneys 43:4 133:8,10 155:16 167:13 audio 6:9 183:15 audit 228:5 267:13 author 176:7,9 authored 125:4 125:7 authoring 174:20 175:8 authority 114:3 196:7 260:21 authorize 280:11 authorized 200:11 available 196:17 206:21 214:12 250:13 ave 278:1 avenue 3:12,20 avoid 196:19 255:16,16,17 257:17 awarded 13:3,6 aware 21:21 34:16 59:20 63:4,8 93:11 173:21 182:22 185:8,22 188:10,19,22 191:19 192:2,6 204:9,12
--	--	--	---

210:21 218:12 220:15,17 230:6,10 237:5 237:7,11,20 254:11,12	badgering 57:10 balanced 60:20 banner 13:18 13:19 207:14 207:18 209:2 209:10 212:1 212:17 banners 198:21 baptist 1:6,8 2:14 3:17 6:15 7:19 8:4,6,9 111:22 184:14 227:22 262:22 266:19,22 267:5 278:6 279:3 280:3 bart 32:1 95:20 based 22:11,13 30:18 37:3 57:4 137:9 188:3 195:21 211:21 217:13 221:16,19 222:6,11,19 223:17 224:1 224:20 225:1 225:10,14,18 225:21 226:7 226:17,22 227:8,21 228:7 229:20 259:13 basic 12:3 56:9 252:13	basically 201:16 basis 112:8 203:20 252:7 bates 5:10,11 5:12,13,14 161:19 183:8 batts 270:20 bbundren 3:7 bcc 159:5 beach 89:9 bedroom 168:8 began 28:1 87:9 88:4 90:7 167:7,22 beginning 7:7 67:21 100:12 256:18 begins 124:19 behalf 2:2,13 3:8,17 6:14 7:10 8:1,3,5,8 182:6 193:10 193:11,12 211:5 215:16 216:10 239:22 252:2,3 264:17 266:7 belief 30:19 71:16 believe 18:8 19:21 24:9 26:18 32:3 33:10,14 38:16 38:20 60:16	64:2 67:20 72:6,17 79:22 86:11 87:10 88:2 90:13 95:5 139:13 170:16 174:11 174:12 187:13 191:7,11 202:4 202:13 205:7 217:20,21 222:6 231:10 241:12,19 242:11 260:15 260:19 261:5 263:1,3 264:19 266:8 274:20 believed 35:12 36:17,19,22 93:1 besen 4:6 8:5,5 best 12:4 71:16 193:15 275:10 beyond 33:11 33:14 36:11 37:10 54:3 154:5,12 215:8 bigger 10:15,17 bill 116:18 118:3,8 217:3 billable 119:17 119:21,22 billed 108:9 112:8,10 115:3 116:4,12,15 154:10 216:15
b			
b 1:10 6:13 7:16 24:4 33:7 33:15 42:11 153:6 154:5 180:18 182:15 219:7,21 278:8 279:4,9 280:4 280:13 281:20 bachelor's 12:22 back 73:6 75:20 76:9 79:14 88:2 93:8 94:2,5 121:4 138:2,3 139:2 143:11 148:19 151:10 153:16,22 160:3 165:15 165:18 167:14 177:9 211:17 214:21 232:3 234:7 238:19 245:1 259:8 278:14 background 9:5 14:13 24:21 195:21			

billing 112:16 bills 112:21 113:3,9,12,19 114:5,15 bischoff 172:11 bit 10:2 24:20 57:10 blair 3:19 blame 210:11 blankenship 34:11,21 35:2 35:4,14 36:19 37:4 38:11 57:21 58:18 183:14 blankenship's 37:18 38:17 blue 234:16 235:2,15 board 197:22 body 63:14 boss 19:16 169:7 bottom 124:16 161:14 162:1 169:3 248:13 251:1 boult 2:16 3:3 bradley 2:16 3:3 bradley.com 3:7 brandon 3:2 7:18	breadth 200:13 break 85:14 93:18 165:9 238:8,13 bring 248:19 248:22 249:3,6 249:9,12 272:19 brought 198:14 bruce 262:16 262:20 265:13 budget 23:10 bullet 31:1 77:18 126:3 135:14 272:4 272:12 274:9 bundren 3:2 7:18 business 23:6 button 146:12 163:4	259:3,7,11 261:15 272:13 called 8:15 194:5 196:14 223:20 224:4,5 224:7 244:19 256:20 calling 68:7 calls 186:13 271:8 cancellation 261:20 canceled 258:15,17 261:22 canceling 252:7 254:1 capability 148:2 capacity 21:21 33:12,14,17 34:9 35:7,19 36:13,15,16 37:13,15 38:3 38:15 39:15 41:2,11 43:13 44:3 46:1 47:4 47:21 48:14 49:8 51:5 52:11 53:5 54:17 55:14 56:15 57:8 58:5,13 60:10 61:5 62:1,17 64:1 68:21	73:20 80:18 81:7 83:1 84:6 85:8 98:21 100:9 111:13 113:7 115:9 117:8 118:13 124:7,11 153:9 153:10 154:5 154:16 182:6 182:20 186:20 189:13 190:19 193:14 195:20 199:4 200:3 202:3,12 215:13,22 216:20 217:22 219:10,12 care 63:2 64:4 64:10 carefully 238:3 case 1:5 6:18 30:3 83:17 106:15 109:12 132:4 278:6 279:3 280:3 casting 178:22 causes 189:5 caution 18:18 caveat 18:4 cc'd 171:5 ceo 19:8 32:21 46:20 50:15 80:2 82:18 83:14 91:11 95:14 99:11
	c		
	c 2:1 3:1,18 4:1 5:1 6:1 ca 278:22 call 20:11,15 76:13 77:3 79:2,16 152:11 164:11 169:10 169:11 171:2,3 171:9 184:6,8 195:3 255:13 255:14 callas 2:15 7:17 7:17 258:11,21		

101:8,11 144:3 184:14 188:10 certain 93:8 161:13 178:5 236:19 237:9 certainly 33:12 194:15 218:1 239:12 247:12 certificate 277:1 280:11 certification 279:1 280:1 certify 277:4 chain 161:10 chair 263:3 266:18 chairman 32:1 33:1 95:21 263:2 challenges 12:2 chance 84:11 178:5 change 225:18 241:22 260:22 261:8 278:12 278:13 280:8 281:3 changed 226:1 256:2 changes 127:2 127:3 260:9 278:11 279:7 280:7,9 characterizati... 175:4 227:17	246:21 characterize 67:16 68:1 81:18 characterized 69:3 charge 222:10 222:18 223:1,1 224:15 225:13 225:20 237:16 charged 108:10 110:3,3 111:22 272:3 charging 110:10 charleston 2:19 chart 88:11 check 230:14 231:3 chief 31:21 32:22 70:13 71:4,6,7 95:17 choice 254:15 254:16 choose 22:9 38:20 179:14 195:16 251:19 254:17 chose 180:13 198:13 christina 172:11 church 144:6 184:14 263:2	circumstances 56:12,18 57:5 59:21 citizen 152:20 178:20 civil 279:5 280:5 clarify 51:8 247:15 clarity 21:17,17 clean 114:9,11 clear 32:16 40:8 45:7 46:20 77:14 97:6 116:1 127:17 135:5 168:7 196:20 197:13 207:22 208:1 240:14 254:12 259:13 260:3 clearly 179:4 cleveland 278:2 click 9:20 16:21 66:4 123:17 131:5,6 146:9 146:13,21 208:12 209:7,9 209:13 211:22 213:3,21 214:2 233:20 235:1 clicked 10:8 204:22 clicking 147:7 235:14	clicks 198:20 199:18 client 51:14 59:10,12 129:12 133:12 155:18 167:14 167:17 218:4 267:18 client's 130:7 137:21 close 90:16 106:11 165:9 258:7 closed 259:1 closer 188:12 cnn 191:10 coc 125:18 126:4,16 127:2 128:12,18 129:2,5,18,20 132:4 143:12 145:7 159:11 159:12 164:11 169:10 172:14 coc000014 5:11 cocktedits.do... 170:11 code 71:13 colleague 198:1 colleagues 18:9 18:11 242:13 collect 245:4,11 245:15 246:15 247:22
---	---	---	---

collected 23:22 126:5 243:7 collecting 24:6 collection 243:20 244:6,9 244:15 collective 184:8 collectively 192:14 college 12:20 13:1 collura 31:22 71:3 100:13 combined 34:18 come 11:1 24:21 67:19 173:16 193:5 194:3 215:5 263:8 270:22 comes 175:9 comfortable 70:19 107:1 coming 67:9 159:15 comment 127:2 163:20,21 164:2,9 166:4 166:7,13 167:6 168:6,7,10,14 181:5 183:20 183:21,22 184:1,7,12,16 185:2 187:22 188:2,4 189:9	259:21 comments 90:17 161:13 167:16 171:4 171:12 187:19 199:19 203:12 240:1 241:10 241:14 242:2,7 242:8,12 244:10 260:8 268:14 commission 277:21 279:19 280:25 281:25 committed 134:11,21 135:18 136:20 137:13 139:8 140:14 141:18 142:21 144:16 committee 1:7 2:13 5:4 7:18 8:7,9 77:17 78:8,17,18 80:14 90:20 91:6,22 107:21 112:1 122:7,7 123:9 127:21 128:3 130:20 131:19,20 134:12,21 137:5 138:12 138:18 140:8,8 140:12,20 141:3,4,9	144:4 148:4 150:10 152:11 152:18 158:9 159:22 165:2 166:8,18 168:11,14,17 227:12 228:6 230:7,12 240:4 240:12,12,13 240:16,20 241:5,18 242:8 242:9,15,16 259:6,12,15,20 260:9,11 262:22 263:4,7 263:9 266:7,22 267:13,14,22 268:1,4,8,8,13 268:15,17,21 269:1,3,5,8,10 269:11,13 270:4,5,9,10,18 271:4,5,16,18 271:19 272:2 272:19 273:7 273:11,20 274:1,11 275:1 275:12,18,19 committees 240:3 communicate 23:19 communicated 18:9,12 23:18	communication 18:21 245:13 communicati... 18:3 31:16 100:14 218:9 239:13 community 205:9,18,20 company 19:8 23:11 25:15,20 26:4 30:1 32:17,20 47:15 48:18 49:2,12 49:12,13,19 60:18 62:10,12 65:8,14,21 67:13 69:4 70:4,21 75:22 80:2,7 82:18 83:15 95:15,21 99:11 115:3 123:8 139:5 142:10 157:3 174:6 188:11 203:5 214:18 221:22 222:5 225:19 237:4 237:10,21 239:22 243:19 247:6 company's 66:14 compensated 117:3,9
--	--	---	--

compensation 220:3 225:17 226:1	154:17 164:22 166:16	conduct 69:17 251:5 267:12	98:17 110:4,19 115:4 217:3 229:4
competence 46:13	concerned 44:20 47:12 204:13	conducted 30:11 33:21 65:14 192:13 228:3	consensual 35:15 36:6 37:9,19 38:12 58:1
complainant 69:18	concerning 239:14 243:3,4	confer 194:3,7 194:8 195:2,4 195:8 196:2,6 196:7,15 197:17 200:1 216:6 219:8 247:15 248:7,8 250:11,14,16 250:17 251:7 253:6 255:22	consent 58:8,14 58:18
complainant's 29:20 31:4 32:6 69:19 76:2	concerns 43:20 44:5,12 47:16 48:6 51:16,19 53:13 54:22 55:4 56:12,19 97:7 98:3,6,8 104:1,4 154:9 158:2 190:14	confidential 152:11	consider 174:8 221:10,12
completed 206:1 235:12 278:14	concert 82:4 158:3 180:13 234:4	confirm 131:17 136:12 139:18 177:4 178:5 184:13,17 196:11 234:3 255:5 257:5	consideration 54:19 56:17
completely 128:15 129:1 196:5 209:18 252:11,12 253:16 256:8	conclude 87:5 102:11 267:11	confirmed 177:12,22 185:1	considered 56:20 57:1,2 174:12
compliance 16:1	concluded 276:14	confirms 70:2	consistent 186:5
compliant 16:8	concluding 37:7 101:21	confused 88:3	consistently 83:16 85:10
comply 178:20	conclusion 30:14 37:18 38:10 51:17 87:3 126:12,16 146:16 186:14 271:8	connection 17:15 18:16 19:10 64:7 65:9 70:21	constitute 188:1
compound 63:6 157:7	conclusions 134:5,17 143:11 144:13		cont'd 3:1 4:1
computer 75:6 130:19	conditions 267:15		contact 34:2,13 34:17,20 59:11 59:13,19 180:22
concentrating 13:4			contained 152:10
concept 64:10			contains 183:13
concern 44:9 44:13,14,15,16 48:9 57:21 73:11,16 101:10,15			contend 82:11
			content 190:21 204:15,21 212:9 247:3,18

context 77:7 78:6 188:4 continue 6:10 69:22 238:20 254:16 continuing 126:22 274:9 contractor 217:3 218:16 222:1 225:19 contractors 242:21 244:12 contrast 29:5 214:1 control 164:8 controlled 16:8 16:14 convenient 85:13,15 convention 1:6 1:8 2:14 3:17 6:16 7:19 8:4,6 112:1 228:1 262:22 266:19 267:1,5 278:6 279:3 280:3 conversation 18:19,21 19:5 19:7,15,22 79:19 86:13 106:12 253:13 253:14,17 conversations 6:7	cooperation 100:18,19 122:7 123:10 127:22 128:3 130:21 131:20 137:5 138:13 138:19 140:8 141:3,4,10 148:4 150:10 152:12,17 158:9 159:22 166:8 168:11 168:15,17 240:4,11,16,20 241:6,18 242:9 242:15,16 260:9 268:1,8 268:13,13,15 269:3,8,10 270:4,5,9,17 271:4,16,18 copy 63:2 123:8 129:9 131:16 137:4 138:11,18 139:5 143:16 169:6 188:7 259:15 260:5 265:2,18,20 corp 127:22 corporate 7:15 9:1 21:19 193:18 194:16 195:1 200:12 203:17 215:16	217:22 219:10 252:3 corporation 211:5 215:16 216:10 correct 12:11 13:1,2,5,7 20:2 20:16 22:22 28:4,11 33:2 41:20 50:17 56:3,4 78:4,22 79:17 82:19 92:15,18 94:21 95:16 96:4 99:8,10,16,21 106:7,13 128:15 130:8 131:22 146:11 147:8 152:19 169:21 171:13 186:3 192:17 205:4 229:11 231:5 240:19 243:21 246:16 248:21 249:2 259:14,17,19 259:22 260:10 260:11 264:15 265:10,14 275:21 corrections 278:11 280:17 corroborate 36:7 93:13 180:21	corroborated 30:20 32:8,12 32:14,18 33:5 33:9 36:5 55:20 58:9,15 59:4,10 94:21 96:4,22 97:22 corroborating 39:6 55:9,20 corroboration 34:5 51:10,11 52:15 53:12,14 53:16 54:8,20 56:19 57:17 92:19 93:4 96:7 98:11,14 98:16 99:7,13 100:5,20,21,22 181:8 184:3 counsel 5:3,4,5 5:18 7:5 8:17 18:1,7,20,22 19:4 20:1 23:15,18 24:10 31:11,20 94:3 121:2 136:3,14 136:15 165:16 196:8,9 202:22 203:2,11 210:3 218:10 233:13 238:20 249:20 258:7 259:6,12 262:5 272:8,14 272:17,18 277:10,13
--	---	--	---

counsel's 262:7 counseling 183:13,15,16 184:15 counted 66:17 counting 66:16 66:22 67:1,4 county 279:10 280:15 couple 260:2 course 13:12 18:4 23:6 51:15 57:11 145:1 250:5 253:15 256:2 court 1:1 6:17 7:3 17:18 28:16 45:8 50:9,12 65:7 72:10 80:6 89:3 105:22 110:20 115:2 121:5 132:6 136:9 139:16 141:22 142:3 148:13 152:3 178:9 180:9,9 193:17 194:6 198:19 199:17 208:2 229:5 252:2 253:8 257:12 266:14 279:7 courtesy 57:12	coverage 191:10,12 covered 31:1 60:22 89:20 create 157:15 158:5 186:8,18 created 224:21 225:2 creating 157:4 credentials 228:6 230:12 267:14 crutch 105:20 crystal 77:14 197:13 207:22 254:12 csr 1:17 277:2 277:20 cummings 2:16 3:3 current 14:5 currently 14:13 14:15 16:5 17:22 211:1 cv 1:6 6:19	150:12 196:14 205:19,20 251:9 278:8 279:3,9,19 280:3,13,25 281:20,25 dated 42:12 190:8,13 dates 192:17 250:17 251:8 253:5 255:7,8 daughter 85:11 day 17:10 149:8 150:8 152:14 153:3 153:15,17 156:5,6 203:7 203:7 261:6 276:14 279:16 280:22 281:22 days 123:10 138:13 148:14 250:21 278:17 dea 14:11,14 16:1,2,7,8,13 109:22 dealt 253:1 dear 278:9 deceive 233:15 decide 223:9 decided 38:10 85:21 106:22 231:20 deciding 38:8	decision 29:19 30:7 32:5,8,10 37:19 40:16 43:9,16,19 49:15 50:11,13 50:15 51:3 52:15 55:6 57:20 62:22 63:12,15 73:9 86:2 87:14 88:10 90:10,22 94:9,17 98:4,7 98:13 104:4,12 260:21 261:7 261:11 decisions 45:13 49:14 declared 71:13 deed 279:14 280:20 deemed 278:18 defamation 178:22 defaulted 252:10,11 defendants 1:8 define 26:11 68:2 definitely 82:12 270:19 definition 44:8 44:19 45:1 definitively 144:21
	d		
	d 2:3 6:1 d.c. 1:15,21 6:22 daily 191:8 dame 13:12 date 1:12 80:8 125:16 126:6 128:1,21 130:16 145:9		

degree 12:22 13:3,6	150:4 153:6 158:14 160:20	despite 49:10 199:22 216:6	direct 153:7 274:18
deliberated 97:21	171:20 180:18 187:4,11	despites 219:9	directed 257:12
deliberation 32:20	192:21 195:14 208:9 232:6	destroyed 126:12	direction 245:4 277:8
deliberative 51:8,14,18 52:3 53:11 178:4	238:22 250:19 251:3,5,12,15 252:6,8 254:1 254:5,9,14,16 258:14,17,18 276:3,7,13	detail 181:7 184:2 272:20	directly 135:18 136:20 137:14 139:8 140:15 141:19 142:22 144:17 235:16 236:20,22 263:5
delineated 272:11	277:3,5,8,12 278:8,10 279:1 279:3 280:1,3	determination 32:17	director 15:16 26:1 220:8
delivered 138:18	depositions 261:22	determine 150:6 226:22 229:6 234:7 236:4	disagree 227:17
denhollander 188:6	describe 30:6 31:15 127:13 206:1 211:20 242:19	determined 22:20 30:21 46:15 47:6 50:5 51:9,18 51:20 54:19 92:11 101:17 102:5	discounted 116:10,19
denial 30:21	described 40:9 70:5,7 94:8 160:14 184:21 201:10 243:10	determining 96:3 144:22	discovery 24:1 133:5 134:4
denied 26:16 27:5 34:1,19 59:19 180:21	description 5:7 69:5 105:6	different 51:7 94:18 109:5 125:7 230:15 253:16 256:12	discuss 17:22 31:9 63:9 86:3 100:17 106:10 115:14 126:17 127:1 161:12 239:17
department 24:8,17,18 113:1 224:6 278:20	descriptions 226:22	differently 25:21 26:11 29:5 247:14	discussed 30:17 31:3,6,7,10 51:9,15 79:16 79:18 86:7 90:21 91:3,9 95:6 98:12 101:5 169:19 170:5 216:11
depends 254:5	designate 247:6	difficult 106:15	
deposed 21:20	designated 16:1 17:14 125:19 167:13		
deposing 153:10	desire 255:11 255:12,13		
deposition 1:10 5:6 6:13,20 7:16 9:1,10 16:18 17:6,16 21:7,20 22:14 28:1 57:11 93:12 123:18			

discussing 18:19 53:8 184:22	21:15 22:9 64:17 150:3,11 184:7 248:1,10	draft 26:9 27:7 27:19 123:2,6 127:13,14 137:7,18 139:4 139:11 152:17 167:16 170:10 172:13 173:6	190:21 195:5 195:11 196:11 245:5,20,21,22 251:17,19 257:5 258:2,3
discussion 32:2 53:11 85:20 87:1 91:19 98:22 99:12 242:13 255:17	248:19,22 249:3,6,9,12,18 254:5,13,20 259:2,4	drafted 26:11 124:13 125:5,6 137:19 142:19	earlier 26:6 159:10 160:14 242:1 243:5,9
discussions 86:9,10 98:10	60:20 83:6 119:9 150:5 157:14 158:4	drafter 142:18	early 185:12
displayed 270:3,4,8	170:1	drafting 25:1 25:16 26:17 27:4,6,13 28:3 28:6 29:4 185:13	east 2:17 easy 44:19 226:15
disregard 37:4	doj 64:16	drafts 242:3	ec 87:8 88:3 135:18 136:20 137:14 139:8 140:15 141:19 142:22 144:17 146:12 163:14 164:4 166:2,6 201:16 204:1,7 207:15 209:3 210:17 211:5 213:2 214:16 232:21 258:7 258:18
distributor 16:12	dollars 80:12 81:1 112:2	drive 183:12	ed 159:11,11
district 1:1,1 6:17,17 196:21	doubt 229:19 229:21	drug 16:3	edit 113:19 173:18 176:10 176:16 179:15 180:1 259:20
division 1:2 3:4 6:18 221:16,19 222:5	doubts 103:22 104:4 107:9	due 198:7	edited 26:2,10 26:16 28:7 29:4,6 148:15 174:9 252:14
doctor 16:13	douglas 185:4 185:5 187:3 188:5	duly 8:15 277:5	
document 21:11 42:18 43:2,3,7 66:3,6 74:13 105:7 125:4 133:8,10 139:14 151:16 155:6 159:1,6 159:17 174:15 187:10 193:1,2 210:8 241:12 248:3 252:15 252:19	download 11:11	duplicate 82:13	
	downloaded 11:19	e	
	dozen 33:18	e 2:1,1,5,7 3:1,1 4:1,1 5:1 6:1,1 18:8 21:11,12 21:13,15 22:10 31:22 84:22 85:3 86:13 125:15 145:15 158:17 161:10 169:5 170:6,8 172:5 187:3 188:4 189:3,19 189:22 190:8	
dr 42:21 43:2 181:20 260:3 260:12 261:12 261:12 262:19 262:20 265:13 266:16,17 270:19			
documents 18:8 21:9,12			

editing 26:14 26:17 30:18 172:21 173:1,2 173:4,9,17 175:8 edits 156:17 170:15 172:14 172:14 174:3,5 174:12 176:20 177:15 178:12 240:1 241:9 260:8 education 12:19 13:12 effect 73:12 effort 202:8 227:11 efforts 201:7,20 216:6 219:9 226:4,5 243:6 258:3 eight 258:15 either 42:20 68:4 87:11 125:19 133:11 145:15 146:14 166:12,13 242:7 251:8,9 255:7 electronic 15:14 131:16 183:12 ella 4:7 email 278:16	employed 14:13 15:16 277:11,14 employee 185:6 216:15 220:20 221:5 222:4,8 277:13 employees 242:21 244:12 246:19 247:8 employment 14:6,9 15:6 enclosed 278:10 encounter 36:18,22 39:10 encounters 36:21 endeavor 226:5 enforcement 16:3 engage 65:22 122:11 engaged 223:12 231:1,2,11,17 231:19 232:1,1 engagement 86:5,20 87:2 89:20,22 90:2 92:7 94:11 95:3,12 96:21 101:4 102:11 102:15,21 103:3,5,8,9,13 103:15,19	104:8,13,20 105:12,21 106:13 108:10 108:13 110:11 110:20 112:17 113:13 114:17 117:4,13,15,20 121:6 122:9 123:13 143:20 155:10 198:20 205:16 230:6 230:16,18 231:9,22 261:11,13 262:11 264:10 264:10,13,15 265:16 266:13 267:3,15 272:7 273:22 275:3 engagements 108:11 199:19 enhanced 177:12,22 ensure 271:5 271:19 entered 280:9 entire 10:13 19:21 49:2 84:21 113:13 181:22 239:16 279:5 280:5 entity 60:20 entries 183:13 entry 227:22 228:6	equivocation 29:18 errata 278:12 278:17 280:7 280:10,18 281:1 especially 133:9 esq 278:5 esquire 2:3,4,5 2:15 3:2,9,10 3:18 essentially 166:16 establishing 230:13 estimate 15:1 65:18 116:7 118:16 119:20 121:5 estimates 122:3 et 6:16 278:6 279:3 280:3 evaluation 95:1 evening 169:18 evenings 85:11 event 40:19 56:6 81:10 173:8 events 41:7 55:3 56:2 93:5 107:10 170:20 everyone's 271:2
---	---	--	--

evidence 48:12 77:15 82:5 90:9 93:12 140:19 exact 106:16 142:20 exactly 27:15 144:9 156:13 178:10,10 206:3 208:2 223:15 229:4 253:2 258:1 268:19 examination 5:2 8:17 259:6 262:5 273:10 examine 163:14 166:2 examined 8:16 example 16:10 94:20 189:4 exception 129:6 252:12 exchange 86:18 exchanged 242:20 244:11 246:19 247:8 exciting 81:10 81:20 excuse 24:19 86:16 122:21 146:6 148:7 177:2 executed 280:10	execution 279:14 280:19 executive 1:7 2:13 5:4 7:18 8:6,9 13:11 15:20,22 16:5 19:11 77:17 78:8,17,18 80:14 90:20 91:6,22 107:21 112:1 129:13 129:14 134:11 134:21 144:4 165:2 166:18 220:8 227:12 230:7 240:2,12 240:13 259:6 259:12,15,19 262:21 263:4,7 263:9 266:7,22 267:13 268:1,8 268:16,21,22 269:5,12 270:10 271:5 271:19 272:18 273:6,11,19 274:1,11 275:1 275:12,18,19 exhibit 9:9,9,10 10:10 12:17,18 14:8 15:14 16:17,17,18 17:16,20 22:18 25:5,5 41:22 42:4 66:3,4	75:5,7,10 85:4 123:15,16,16 123:18 125:4 125:18 127:10 130:2,19 131:18 138:2,3 141:12 142:4 148:20 154:19 155:13 158:10 158:11,14 159:13,21,21 160:19,20 161:2 165:19 165:19 167:2 168:22 171:18 171:19,20 183:6 187:2,2 187:4 193:2 208:9,12 209:19 232:5,6 232:9 262:14 262:16 exhibits 5:6,18 exist 223:3 249:18 existed 224:12 236:4 existence 223:5 expect 28:15,20 expense 262:2 262:3 expenses 261:20 experience 14:6 14:9,11 37:3	227:20,20 228:7 230:1 expertise 30:19 expiration 279:19 280:25 281:25 expires 277:21 explain 44:5,11 68:12 128:22 164:3 166:5 178:9 180:11 181:2 256:14 explained 97:18,20 197:22 203:20 242:10 explains 76:3 express 43:20 57:2 96:9 expressed 46:21 48:18 49:15 50:21 52:2,7,21 96:18 expressing 48:5 103:22 164:22 extent 33:5 67:19 99:6 100:3,12 239:12 extracted 133:5 134:4 eye 1:21 eyes 42:18 43:4 66:12 133:8,10
--	--	---	---

143:2 155:16 167:13 227:7	104:13,17 115:20 121:22 122:8 152:22 166:19 170:18 179:1 213:17 242:9 269:13	feedback 240:1 241:10 259:21 feeding 63:2 64:5,10 feel 139:19 156:16 167:7 167:22 200:21 fees 258:20 261:19 feign 254:19 felicia 1:17 7:3 277:2,20 fell 86:5 91:1 96:8 98:14 104:5 261:12 felt 52:14 53:16 59:9 87:15,16 female 144:5 fiduciary 271:6 271:20 field 13:4 fifth 167:6 fight 253:20,21 file 194:4 196:22 197:1 253:7 filed 6:16 30:3 final 185:21 259:16,22 260:6,21 financial 23:2,5 215:6 financially 277:15	find 66:19 147:8 206:7,8 278:10 finding 81:2 163:7 fine 10:5 11:6 22:5 49:3 210:4 256:16 263:20 finish 60:7 88:17 169:10 194:19 195:7,7 finished 251:15 fired 231:8,11 firm 7:4 226:1 first 8:15 10:19 11:1 20:22 53:7 61:11 67:22 69:15 74:2,4,19 75:12,16,17 76:1 78:9,12 78:13,15 89:7 124:16 129:3 129:21 132:2 134:16,16 135:13 144:2 145:5,6 152:4 157:18 160:14 160:17 184:14 191:16,18,19 192:2,8,11,19 209:10 227:22 228:6 230:2 240:7 258:18
f	faith 195:9,17 216:6 221:16 221:19 222:6 222:11,19 223:17 224:1 224:20 225:1 225:10,14,21 226:7,17,22 227:8,21 228:7 229:20 256:19 256:20 fall 98:11 false 178:22 252:11,12 familiar 132:16 234:6 far 135:17 136:19 137:12 139:7 140:13 141:17 142:20 260:4 favor 38:8 131:6 fbc 164:7 february 76:1 76:11 77:15 79:19 81:3,11 82:3 228:13		
fact 18:1 30:1 31:10 34:19 49:10 59:3,17 62:9 71:19 90:19 92:6 128:10 132:14 142:4 189:16 194:12 235:9 235:22 268:9 facts 48:12 56:10,16 140:18 157:11 157:14 227:19 factual 123:10 126:17 127:14 129:2,3,12,13 130:7 138:11 138:13 141:7 142:8,9 143:22 144:7,11,15 148:7 150:10 152:9 173:22 177:4,13,22 223:10,13 241:15,15 factually 142:10 233:8 233:17 failed 195:9 fair 12:14 14:1 24:22 26:20 60:20 72:7			

261:19 268:22 269:19 275:5,7 firsthand 39:10 39:21 56:1 fit 94:10 95:2 five 14:12 15:11 65:19 83:3 109:10 112:2 123:10 138:13 198:6 272:11 floor 3:13 flow 116:21 focus 191:17 192:22 272:20 focused 274:7 focusing 24:20 43:16 57:16 156:5 226:3 foggy 167:7,22 follow 94:6 111:20 230:6 230:16 followed 195:4 following 94:16 138:10 183:16 268:20 272:3 follows 8:16 followup 61:10 261:19 262:7 force 84:21 122:17 123:1 123:11 124:1 125:12,20 138:14 141:14	145:13 146:5 146:19,19 181:21 188:9 204:20 205:2,5 205:7,13,15 206:5,6,16 212:6 214:13 230:11 231:3 233:22 234:1 236:8 240:3,11 240:15,18 241:1,11,21 260:17 263:3,5 266:18 267:7 267:19 275:16 force's 146:6 foregoing 71:10,14 277:3 277:5 279:13 280:18 forensic 243:20 244:5,9,15 forgotten 258:2 form 56:13 60:14 61:2,20 63:5 77:10 79:4 81:16 85:6 92:21 96:11 97:1,10 101:13 102:1 102:17 104:14 108:3 110:6 111:2,11 112:18 113:22 114:13 117:5	130:3 132:8 135:3 141:20 142:5 143:17 144:18 145:19 147:17 149:10 152:6 154:2 156:21 157:6 164:18 165:4 166:20 170:2 170:21 174:16 178:14 179:17 184:18 185:15 186:11 188:14 189:10 199:1 199:11 202:10 203:19 213:5 223:19 228:10 243:22 270:5 271:7 272:13 273:15 formal 223:22 224:18 formalities 223:22 formally 231:22 formed 225:11 former 39:20 87:8,20 forth 71:9 88:2 267:15 forward 12:20 67:19 85:21 197:14 255:3,5 276:4,5 278:14	forwarded 171:8 forwarding 190:12 found 37:5 80:12 four 15:11 86:18 90:22 91:10,18,20 92:5 95:6,7,10 95:11 96:2 101:5 106:1 171:2 198:3 254:7 268:20 269:4,12 270:10 272:4 fourth 120:19 120:22 frames 204:19 frank 181:19 181:20,20 182:3 183:2 260:3 262:17 262:20 265:13 266:16,17 free 18:5 19:1 107:13 139:19 200:21 248:4 279:14 280:20 friday 145:11 169:18 196:12 196:13,14 197:19 257:2,2 257:4
--	---	--	--

front 15:13 17:3 25:4 41:22 75:7 84:19 136:7,11 158:11 165:21 207:20 232:10 234:15 239:1 264:11 fulfilled 271:5 fulfills 271:19 full 147:2 206:2 220:19 221:5 222:4,8 244:10 fully 263:21 function 112:16 funding 275:17 275:17 funds 263:8 further 42:17 218:21 272:20 277:12	gentleman's 122:13 gentlemen 270:16 getting 193:9 263:17 give 16:10 17:15,19 24:21 38:10 60:21 76:12 85:12 103:16 104:6 104:11,17 105:5 123:8 131:1 141:14 163:1 167:10 176:18,19 178:4,12 179:1 179:10,13,15 180:14 194:10 194:14,16,22 199:8 203:17 209:14,20 212:13,19 215:15 234:20 239:22 241:15 244:10 246:5 246:18 247:7 264:1 given 63:9,18 75:22 137:5 148:5 152:17 159:22 160:7 180:5 197:15 200:11 227:1 238:5 245:10	246:3,6 259:20 267:4 277:9 giving 45:8 69:5 179:22 234:20 248:14 go 6:11 11:10 16:16 24:5 42:16 45:14 73:6 74:10 75:20 76:9 85:17 93:8,17 123:15 132:1 138:2,3 139:2 146:20 148:19 151:10 153:22 156:1 159:10 159:13 160:19 161:14,17 163:11 165:18 167:2 168:8 171:9,18 181:6 183:6 184:1 196:22 206:5 206:10 211:17 213:12 214:21 215:5 226:21 231:20 234:7 245:6 258:9 259:8 275:8 276:4,5 goes 183:20 going 6:4 12:2 12:6 16:17 22:10 42:6,19 45:15 46:15	62:5 63:19 66:2,3 82:1 88:1 93:21 94:2 105:15 111:6 120:14 121:4 129:16 133:9 134:15 136:2,16 139:1 144:21,22 145:1 146:8 153:7,9 155:17 155:19,20 165:8,12,15 167:15 169:9 171:19 178:20 190:6 192:22 203:10,11 210:2 225:18 232:3,4 235:13 237:6 238:8,16 238:19 248:13 250:8,8,18 252:22 253:1,2 253:7,8 255:3 255:4,9 257:13 257:15,15 262:13 268:9 275:6 276:2,11 gold 3:11 7:14 245:3 good 6:3 7:12 67:2 70:1 113:11 153:1 195:8,17 216:6 256:19,20
g			
g 6:1 gathered 243:7 gathering 243:2 gcallas 2:20 gene 4:6 8:5 general 16:6,7 122:3 155:19 273:18 generally 39:20 273:14			

258:1,4 goodness 241:2 gordon 4:3 7:1 gp 5:10,12,13 5:14 graduated 13:8 grammar 114:13 great 41:17 70:3 93:19 133:20,22 134:1 143:9 151:9 163:8 264:5 gretchen 2:15 7:17 259:11 groomed 94:11 164:4 166:6 grooming 87:9 88:4 90:7 92:14,17,20 93:10,14 188:1 group 184:22 184:22 225:10 225:14 guess 109:16 111:16 253:15 guidance 105:22 guidepost 1:7 3:8 5:16 6:13 7:14 8:2 9:2 14:13 17:6,14 23:7 24:8,19 37:21 43:10,18	43:21 45:10,12 46:10 49:20 53:1,19 56:11 69:17 71:5 72:13 73:8,14 77:7 81:12 82:4 84:13 90:1,3 92:7 107:14,17 111:18 115:5 116:22 117:10 120:9 121:6,21 123:3 125:20 127:1,2 137:12 145:16 146:10 147:3,11 149:5 150:7 155:10 172:21 173:3 174:21 176:7 176:11,19 177:3,10,15,16 180:13 181:6 182:7,22 185:5 185:12 188:12 189:4 190:14 191:3 193:11 193:12 200:10 201:7,20 202:8 204:13 220:4,9 220:21 221:16 221:17,20 222:11,19,20 223:6,18 224:12,19 225:2,6,9,11,15	225:20 226:5 227:11 230:2,8 230:13 231:1 234:4 235:17 236:20 242:21 244:12,16 246:9,19 247:8 249:18 260:20 262:4,9 264:15 264:18 267:7 272:10 273:3 275:20 guidepost's 5:15 30:6 126:15 174:1 176:20 193:10 198:21 214:18 217:17 261:7 261:11 guidepostsol... 232:20 guys 169:11	257:10,15,19 258:1 happened 106:11,14 131:11 171:2 220:5,6 235:2 235:3 270:15 happening 137:21 205:21 happy 11:9 115:13 hard 129:9 183:12 head 89:9 120:15 150:15 225:21 262:11 headed 268:2,9 heading 132:20 133:2 hear 28:15 105:19 156:12 heard 46:6 64:5 64:8,14,18 78:13 136:15 262:2 held 260:21 help 11:7,9 196:1 helped 151:18 helpful 29:13 74:15 102:21 103:4 104:8 helping 263:17 helps 89:2
		h	
		half 19:22 hall 13:8 hand 53:18 73:13 187:18 258:9 handle 16:14 hands 54:10 handwritten 126:5 hang 219:5 happen 210:3 219:8 248:9	

hereto 277:14 hey 73:12 79:14 highlighted 168:3,4 183:11 183:21 187:15 highlighting 187:15,20 highlights 183:19 hire 223:11 hired 220:19 221:4 222:4,20 262:9 263:4 historically 234:7,8 235:1 236:4 hold 9:16 11:4 66:21 133:7 160:4 161:4 162:7 168:21 228:14 256:7 holding 143:11 holds 16:13 holske 18:13 23:16,17 24:5 31:8 32:21 42:12 59:18 74:3,18 75:11 76:2,12 78:10 79:20 86:15 91:10 95:14 99:18 101:8 156:10,11,15 156:15 169:5	169:16 170:9 172:6,18,21 173:13,21 190:12 191:20 192:3,6 220:14 243:15 home 20:9 hopequest 164:7 184:15 hoping 251:8 257:16,18,19 hospital 16:13 hotline 146:18 207:15 209:3 212:20 213:2 213:10 214:4 232:2 hour 19:22 108:12 109:12 110:3,10,19 111:1,8 112:3 165:9 hourly 108:20 109:18 hours 22:7 83:3 83:16 110:16 118:1,3,8 119:13,16,17 119:21,22 120:10 121:21 254:8 258:16 huh 59:14 76:15,22 77:5 92:2 120:4 127:18 134:9	134:18,22 169:4,20 172:7 183:7 209:8 224:14 225:12 234:17 262:18 264:16 hundred 112:2 hundreds 80:11,12 81:1 109:10 hunt 1:3 4:10 6:15 7:10,22 25:2,17 27:8 27:14 30:8 31:5 32:7 34:1 34:13,14,17,19 35:15 36:7 39:11 42:20,21 43:2,17,21 45:11 46:10,22 47:17 48:9,20 49:21 50:13,20 51:1 52:4 55:7 57:4,20 60:13 60:21 63:17 65:22 67:21 69:18,20 72:4 72:9,11 73:1 73:10,15 86:3 89:15 90:19 91:21 93:15 94:10,17 95:13 96:10,20 97:8 98:17 100:5 106:22 127:19	128:10,17,17 130:1,22 131:21 133:14 145:8 148:10 148:14 149:8 150:7,17 151:15,22 152:5,15 153:16,21 160:16 164:17 165:1 166:17 169:12 172:13 173:6 178:11 179:2,22 180:14 181:15 181:19 182:3 183:2 191:17 191:20,21 192:12,19 241:21 260:5 260:12,13,17 261:12 262:1 278:6 279:3 280:3 hunt's 30:21 86:19 87:17 149:18 170:10 261:12 husband 40:10 54:12 76:2 i idea 80:9,10 107:22 108:6 118:2 235:6
--	--	---	---

ideas 86:19	incident 89:6	269:4,11	228:3 233:4,20
identification	89:10,16 90:21	270:10 278:12	234:16 235:15
9:11 16:19	90:22 91:7	includes 187:17	242:21 244:12
123:19 158:15	92:1 96:8	273:2	267:12
160:21 171:21	101:3	including 7:5	indiana 2:9
187:5 208:10	include 28:7	33:22 38:8,19	indianapolis
232:7	29:19 30:7,22	43:20 45:11	2:9
identify 25:15	31:4 32:6	46:9,22 47:6	indicate 151:14
245:7	37:20 38:18	47:17 48:9	indicated 32:5
identifying	40:17 43:9,17	50:5,15,20,22	94:7 242:6,19
12:3	46:15 50:13	51:12 52:4,7	indicating
ignore 258:9	51:21 52:15	52:19,22 53:19	278:12
image 15:14	55:7 57:20	57:3 78:16	individual
immediate	63:15 73:9	95:13 96:10	21:21 25:16
164:3 166:5	86:2 87:17	97:8 98:6	63:14 153:10
immediately	90:10 94:9,17	103:13 104:1	195:20 251:5
74:19 75:11	95:17,20 98:17	150:6 153:15	252:6 254:1
██████████	100:5 106:22	164:16 187:18	276:7
██████████	114:15 126:19	262:1	individually
██████████	130:21 131:21	inclusion 48:20	37:20 68:5
implementati...	142:3 179:22	49:20 129:17	192:14
230:11 231:3	included 32:20	149:18	individuals
important	32:21 35:14	incorporated	132:5,7
181:8 184:2	54:9 76:7	280:12	inform 254:9
impression	95:11,13 96:1	incurred	information
186:9	96:20 126:9	261:19	12:11 19:2
inaccuracies	127:19,20	independent	23:10 35:3
14:8	128:11,11,17	55:2 60:20	49:16 50:6
inaccurate	129:11 130:1,7	65:9 71:21	51:13 71:9,16
142:11 233:8	130:15 137:4	152:22 153:20	83:14 88:9
inappropriate	142:19 145:8	155:10 157:10	143:22 144:12
90:14,17 144:5	148:9 152:5,16	157:14 174:9	168:20 205:4
187:19 219:7	161:10 171:11	174:13 214:12	212:3,7,19
inappropriately	174:6 177:10	217:2 218:16	213:10 214:17
90:14	201:17 268:15	222:1 225:18	215:3,11

216:12,18 informational 213:8 initials 188:3 inquire 246:2 inquiry 243:10 insecure 181:15 inside 167:8 168:1 insist 256:12 insisting 257:10 insofar 204:13 instance 89:7 270:9 institutional 224:2,3,8,11 instruct 214:10 instructed 209:10 211:22 instructions 245:10,12 integrity 224:2 224:3,8,11 interact 122:16 interacted 122:8 interacting 122:19 interaction 33:20 35:14 36:6 37:8,19 38:11 67:15,17 87:18 102:12	103:14 104:2 104:19 106:2 149:9 interactions 57:22 68:3,7 68:17 69:4 76:4,7 interested 152:21 205:10 205:18 277:15 interim 144:6 internal 142:9 internally 30:17 31:7 interpreted 247:11,13 interrogatories 71:10,15 151:11 153:18 interrogatory 25:7,14 30:2,5 66:11,14 69:12 69:14,16 75:21 75:21 151:12 151:13 interrupt 42:16 155:15 interview 34:1 59:21 60:2,12 61:1,11 62:12 68:2,3 73:1,14 74:3,4,19 75:12,17 76:1 79:20 148:20 149:22 150:8	150:16 151:21 152:15 153:21 191:16,18,20 192:3,8,11,19 interviewed 61:18 63:19 148:14 151:15 interviewing 37:5 149:9 interviews 33:21 64:22 65:7,13,21 66:13,19 67:13 67:17 68:8,16 69:3,6,17 70:5 70:7 71:20 72:5,9,11,21 73:12 76:5 156:6 192:13 192:18 investigate 272:11 273:4 investigation 5:16 30:11,12 30:14,15 60:21 65:10 71:21 80:8 110:5,16 119:10 135:17 136:19 137:12 137:20,22 139:7 140:11 140:13 141:17 142:20 146:12 146:15,16,17 154:11 157:10	204:8 205:10 205:19,21 211:9 212:5 214:7,12 228:4 232:14,21 233:5,21 234:16 235:13 235:16 267:12 investigative 145:3 investigator 153:21 173:14 investigator's 35:9 investigators 30:9 33:20 34:12,15,21 36:15 38:22 73:13 192:12 investigatory 63:14 invitation 212:18,22 213:4 invite 132:15 invited 132:4 195:11 invoices 274:14 274:18 275:11 involve 16:5 involved 24:22 25:1,16,17 27:4,5,13,14 29:19 48:4,4 50:15 51:3
--	--	--	--

134:7 218:2 involving 77:16 78:8,17 iron 255:10 irrelevant 196:4,5 issuance 259:16,22 260:6 issue 58:8,14 58:18 72:12 96:7,7 99:1 100:3 101:3,11 102:8 105:21 197:11 223:10 223:13 254:15 issued 43:18 48:19 150:7 227:12 issues 12:7 51:11,16,20 98:15 126:17 131:21 151:22 178:21 250:12 252:5 257:6	johnny 1:3 4:10 6:15 7:10 7:21 25:2,17 27:7,14,21 30:7 31:5 32:7 36:7 39:11 43:17,21 45:11 46:10,22 47:17 48:9,20 49:21 50:13,20,22 52:4 55:7 57:3 57:20 60:13,21 63:16 65:22 69:18,20 72:4 72:9,11 73:1 73:10,15 86:3 86:19 87:17 89:15 90:19 91:21 93:15 94:9,17 95:13 96:10,20 97:8 98:17 100:5 106:22 127:19 128:10,16,17 130:1,22 131:21 133:14 145:8 148:10 148:14 149:8 149:18 150:7 150:17 151:15 151:21 152:5 152:15 153:16 153:21 160:2 160:16 164:17 165:1 166:17	169:12 173:6 178:11 179:2 179:22 180:14 181:15,18 182:3 183:2 191:17,20,21 192:12 262:1 278:6 279:3 280:3 jon 4:8 josh 122:14 159:9 joshua 158:20 159:8 journal 183:12 journals 181:7 184:2 judge 197:15 257:14 judgment 32:13 33:4,19 36:15,16,20 37:2,20 68:17 220:10 julie 18:14,15 19:18 20:4 30:12 79:15 86:16 112:22 122:18,22 132:3 169:9 171:5 187:3 264:19 265:3,4 265:9 jump 169:11	june 274:2 jury 28:16 50:10,12 52:18 65:8 72:10 80:6,22 105:19 105:22 110:21 148:13 152:3 156:12 178:10 181:3 208:2 223:8 266:14 justify 164:16 k kathy 4:5 keep 67:4 190:5 205:17 219:3 keeps 202:22 kept 30:12 183:12 205:20 kilpatrick 18:13 24:11 31:9 32:22 42:11 59:18 86:15 91:10 95:14 101:7 156:7,10,15 169:6,15 170:9 172:20 191:21 192:3,7,7 220:18 221:19 225:16 243:14 kind 28:14 45:10 46:9,21 50:22 52:22 57:17 63:1 64:11,11 93:12
j			
j 2:4 jacksonkelly.... 2:20 january 274:2 jh 169:12 job 207:5 joe 270:20 john 270:20			

105:6 113:20	72:14 73:3,17	135:2,7 136:5	194:15,19,22
203:2	74:9 77:10,22	138:6,8 139:12	195:13,16
kissed 90:14	79:4,6,9 80:15	140:17 141:20	197:2,6,9,11,21
kissing 90:16	81:4,13,16	142:1,5 143:14	198:3,6,10
187:18	82:8,20 84:2,5	143:17 144:18	199:1,11,21
klein 3:9,15 4:5	84:15 85:6,13	145:19,21	200:8,18 201:2
7:12,13 8:1,1	85:17 88:14,17	147:4,17	201:4,8,11,22
9:16,19 10:1,4	88:20,22 89:2	148:16 149:10	202:10,18
11:6 16:20	89:21 90:2	149:19 150:18	203:19 206:12
17:21 18:18	91:12 92:8,21	150:21 151:17	207:1,7,9
20:14,22 21:4	93:19 96:11	152:6 153:5	209:17 210:1,4
21:16 22:5	97:1,10 98:18	154:2,12 155:3	210:7,11,18
26:5,18,22	99:14,19 100:7	155:14 156:21	213:5 214:19
28:8,17 29:7	100:19,22	157:6,16 159:1	215:1,8,18
31:12,15,18,20	101:13 102:1	159:14 160:4	216:4,16 217:6
33:10 34:7	102:13,16	161:5,19,22	217:11,20
35:5,17 36:9	104:14,21	162:7,10,14,19	218:9 219:5,17
37:10 38:1,13	106:4,17 107:3	162:21 163:7	222:12 226:8
39:12 40:2,11	108:1,3,14,21	163:10 164:18	227:2,13
40:21 41:8,18	109:19 110:6	165:4 166:9,20	228:10,14
42:15 43:11,22	110:12 111:2	167:11,20	229:7 233:7,14
45:3,15,19	111:11 112:4	170:2,21	234:19 235:4,7
46:1,11 47:2	112:11,14,18	174:16 175:3	235:18,20
47:18 48:11,22	113:4,14,21	175:10 176:1,4	238:11 239:8
49:6 50:1 51:2	114:7,19 115:6	176:12,21	240:6 243:1,22
52:9 53:2,22	115:16,21	177:18 178:14	245:21 246:20
54:14 55:11	116:8,17 117:5	179:4,17 180:2	247:10 248:2
56:13 57:6	117:16 118:4	180:15 181:9	249:16,21
58:2,10 60:3,7	118:10,22	182:5,10,14,17	250:2 251:11
60:14 61:2,20	120:1,11,20	184:18 185:15	253:12 254:11
62:7,14 63:5	121:7 122:1	186:1,11	255:2,11 256:6
63:20 65:1,11	124:6,10 130:3	188:14 189:7	256:8,16
65:15 66:5,9	130:12 131:3,5	189:10,20	257:18,22
66:21 68:9,13	131:8,11 132:8	190:1,5,16	261:17 263:12
68:18 69:8	133:7,19,21	193:8,21	263:15 264:3,5

271:7 273:15 275:2,7 276:2 278:5 knew 56:5 67:20 81:11 91:5,21 137:21 189:5 198:11 198:12 228:13 232:1 241:8 254:20 know 10:14 17:22 20:7 31:9 35:19 37:13 39:15 42:17 44:10 47:4,21 49:8 58:5 62:1,2,17 62:18,20 63:1 63:17 65:16 67:8,8,19,22 69:4,7,11 70:14 73:6,20 80:19 81:8,17 82:13 84:19 86:12 89:9,12 89:14 104:10 108:5,16 116:6 118:14 119:2 124:21 132:10 132:12 133:2 138:20,22 143:1,6 145:9 145:13 147:20 148:1 157:21 161:22 163:19	171:15 173:16 174:3,5 180:19 181:16 185:17 186:2 188:1 189:13 191:9 191:13,15 196:7 197:3 199:4,5,10 200:3 202:3,12 203:6 204:22 205:3 206:3 207:19 209:15 211:1,13,21 213:22 214:5,8 214:14,16 215:21 216:20 216:21 217:4 217:15 218:13 220:5 221:10 224:16 225:22 226:1,11,13 228:2,9,20 229:16,16 231:8 233:8 236:6 241:7 245:5 255:8 260:4 261:3 265:3,3,20 271:1 knowing 218:13 knowledge 12:5 14:14 39:10,21 48:18 49:5,6,9,19	55:3 56:2 71:9 71:16 97:9 219:20 220:2 231:7,21 known 242:17 knows 194:17 208:2 215:12 krista 1:11 5:8 6:14 7:14 8:14 8:21 14:2 26:1 29:18 276:13 278:8 279:4,9 280:4,13 281:20 l laid 251:14 landing 229:20 language 102:20 103:5 103:18 104:7 105:12 127:1,3 135:16 141:8 142:19 175:2 largely 204:10 211:8 late 83:16 85:10 123:2 211:12 lateral 221:8,8 law 13:9 178:21 196:20 226:1 laws 16:9 lawyer 37:3 39:19 152:21	252:18 lead 196:8,8 203:11 leader 224:18 leadership 267:6 learn 211:15 learned 246:14 led 88:5 lee 2:17 left 13:19 94:6 165:19 253:19 legal 1:14,20 7:2,4 31:21 32:22 70:13 71:5,7 95:17 186:14 197:11 271:8 278:1 281:1 letter 90:2 102:21 103:3,5 103:8,9,19,20 104:8,13,20 105:13,21 106:13 123:14 143:20 205:17 231:22 262:11 262:16 264:10 264:11,13,17 266:14,18 273:22 275:3 278:18 lie 59:15 lied 59:10,12
--	--	--	---

light 178:22 likely 184:21 likes 199:19 limit 95:12 239:10 limitation 200:11,19,20 243:4 limitations 239:15 limited 239:13 240:15 243:2 line 55:21 94:8 94:14 134:16 238:4 273:13 278:12 280:7 281:3 link 146:5,6,9 146:18 205:2,5 205:11,12,14 206:4,6,16 233:10,10 235:2 linked 233:5 236:7,7,20,22 linkedin 5:8 9:5 10:11 11:15 12:4,10,12,13 13:20 links 147:8 198:20 236:11 list 61:17 76:8 241:13 272:4 listed 17:20 215:17 280:7	280:17 listen 28:16 listing 68:7 280:7 litigation 234:4 little 10:2 24:20 57:10 litton 159:11 litton's 159:11 llc 1:7 3:8 6:13 17:7,15 llp 2:16 3:3,11 location 1:14 6:20 logged 262:12 263:22 long 19:20 41:5 longer 212:11 look 12:7,15 13:17 41:16 42:5,10 54:10 66:11 70:17 75:5 134:14 150:3 151:11 154:19 158:10 165:10 168:21 170:8 187:1,10 187:14 197:14 208:5 213:13 213:18 226:16 229:2,4,12,15 232:17,22 263:10 264:21 265:5,15,22 266:10 271:12	looked 11:12 22:17,18 72:2 96:6 147:22 148:3 150:9,11 210:22 211:18 looking 18:2 21:18 22:22 42:7,9 56:18 103:3 106:12 137:9 145:10 145:10 155:13 158:4,8 170:17 172:4 186:22 200:6 207:13 242:18 264:9 270:14 272:6,8 273:21 looks 159:4 185:2 lot 67:17 loud 69:15 164:1 166:5 209:2 love 213:20 low 109:7,9 lynn 270:19	50:9 52:18 54:13 55:18 57:2 60:2,12 61:16 62:21 66:2 72:10 75:10 77:6,14 81:22 82:11 83:5,21 94:5 105:19 116:5 127:12,16 130:18 133:4 134:14 143:10 149:7 153:14 154:19 155:9 156:4,12 157:4 157:13,22 158:11 164:22 165:18 172:22 180:10 192:6 192:20 193:5 193:17 203:2 207:14,21 209:11,22 210:6,15 211:3 211:15 213:22 215:15 219:14 222:22 223:8 223:14,21 227:7,19 228:13 229:3 232:3 233:19 234:2 235:9 236:1,19 238:22 263:6 276:1
		m	
		m 1:3 2:15 6:15 7:17 278:6 279:3 280:3 ma'am 9:13 16:16 25:4 27:15 36:3 37:2 41:22 45:18 46:7	

macgill 2:3,6	83:4 84:7 85:1	144:1 145:4	199:6,16 200:5
7:9,9,21 8:10	85:16,18,19	146:2 147:9,21	200:15 201:5,9
8:18 9:8,12,22	88:15 89:5	149:1,13 150:2	201:18 202:6
10:7 11:14	90:1,4,6 91:15	151:3,20	202:15,21
17:2 18:10	92:13 93:3,17	152:13 153:13	203:13 204:5
19:6 21:2,5	94:4 96:16	154:8,18 155:8	206:18 207:4
22:2,8 26:12	97:5,14 99:2	156:1,3 157:2	207:12 208:11
26:20 27:2	99:17 100:1,16	157:12,20	209:21 210:2,5
28:13 29:1,14	100:21 101:1	158:16 159:7	210:9,13 211:2
32:4 34:3 35:1	101:19 102:7	159:20 160:2	213:11 215:4
35:10,21 37:1	102:14 103:1	160:11 161:1,8	215:14 216:1
37:16 38:6	104:16 105:4	162:3,11,16	216:13 217:1,8
39:1,18 40:6	106:8,19 107:7	163:12 164:21	217:16 218:6
40:15 41:4,14	108:7,18 109:3	165:8,17	218:18 219:13
41:20,21 43:6	110:1,9,17	166:15 167:1	220:1 222:16
43:15 44:6	111:7,19 112:9	167:19,21	226:14 227:6
45:6,17,21	112:12,15	170:7 171:6	227:18 228:12
46:3,17 47:8	113:2,10,17	172:1 174:19	228:21 229:13
48:1,16 49:4	114:4,10 115:1	175:6,14 176:5	232:8 233:12
49:17 50:8	115:10,20,22	176:17 177:8	233:18 235:8
52:1,17 53:17	116:2,14,20	178:1,18 179:9	235:21 238:12
54:6,21 55:17	117:11,21	179:20 180:8	238:21 239:17
56:21 57:15	118:7,15 119:4	181:1,13 182:8	239:20 240:17
58:7,16 60:5	120:5,17,21	182:11,16,21	243:8 244:3
60:11,17 61:7	121:12 122:5	185:3,20 186:7	246:1 247:4,19
62:3,8,19	123:21 124:9	186:21 187:1,6	248:12,18
63:11 64:3	124:14 130:9	188:21 189:8	249:19 250:1,7
65:6,12,17	130:17 131:14	189:15,21	252:10 254:4
66:10 67:1,3	132:11 133:13	190:3,7 191:1	255:1,4 256:4
68:14 69:1,13	133:20 134:2	193:16 194:1	256:7,14,17
72:19 73:5	135:6,9,11	194:18,21	257:21 261:18
74:1,16 77:13	136:2,13 138:9	195:12,15	262:6 264:8
78:5 79:12	139:21 141:11	196:3 197:3,8	271:11 272:15
80:21 81:9,14	141:21 142:2	197:10,18	272:16 273:17
81:21 82:10	142:12 143:15	198:2,5,7,18	275:4,9,22

276:9 macgill's 18:5 macgilllaw.c... 2:10,11,12 madam 278:9 made 10:17 32:13,17 36:15 37:21 39:3,5,6 45:13 49:14 63:16 64:22 76:1 86:4 87:14 88:10 90:9,17,22 92:17 94:9 107:16 115:11 115:12,13,14 123:1 160:16 173:19 184:12 194:4 197:13 201:20 203:12 204:20 205:3 206:19,20 230:12 241:20 242:2 243:6 251:20 254:15 258:4,13 279:7 magistrate 257:13 mail 31:22 85:3 86:13 125:15 145:15 158:17 161:10 170:6,8 172:5 187:3 188:4 189:3,19 189:22 190:8	191:8 195:11 245:5,20,21,22 251:19 mailing 84:22 169:5 mails 18:8 21:11,12,13,15 22:10 190:21 195:5 196:11 251:17 257:5 258:2,3 maintained 144:4 majority 129:3 make 10:14,21 27:1 37:2 62:5 63:12 70:19 88:15 92:5 116:1 124:22 127:17 128:6 132:15 146:3 151:7 163:2 168:7 174:15 184:7,16 186:4 197:4 204:17 207:5,21 208:1 223:15 236:12 236:14 246:2 254:16 255:20 makes 64:12 135:13 227:9 making 63:15 73:9 197:6 233:16 243:10	manage 208:19 212:9 managing 15:16 26:1 220:7 mandate 267:4 manufacturer 16:12 march 1:12 6:5 42:12 marchetti 3:19 margin 163:21 margins 242:2 marked 9:11 16:19 42:18 43:4 123:19 155:16 158:15 160:21 171:21 187:5 208:10 232:7 market 2:7 marketing 201:1,7,19 202:8 materials 123:2 123:6 math 83:8 120:7,15,15,16 121:18 matt 3:18,22 8:3 matter 6:15 83:22 85:4 109:4,5 114:18 120:9 121:21	141:15 169:12 216:15 235:9 267:19 matters 109:2 109:22 110:15 mbc 191:12 mean 44:5,16 77:12 114:12 135:12 170:4 184:10 229:18 266:1 267:11 meaning 64:6 171:11 means 128:9 212:13 meant 32:11 49:2 100:20 mechanism 233:5 media 6:12 191:2 199:20 meet 126:16 195:2,3,6,8,9 196:2,10,15,15 197:16 200:1 216:5 219:8 247:15 248:7,8 250:9,11,13,15 250:17,22 251:7 253:6,8 255:22 256:2,5 256:11 257:11 meeting 37:6 50:18 127:3 145:7 255:16
---	--	--	--

255:17 257:11 member 77:17 78:8 80:14 125:20 164:4 165:1 166:6,18 242:8 262:21 268:3,16 274:22 members 78:18 132:4 134:12 134:21 135:19 136:21 137:14 139:9 140:15 141:19 142:22 144:17 163:14 166:3 240:22 241:5 268:16 268:16,20,21 269:4,12,12 270:10 273:7 273:12,20 274:1,11 memo 130:6 141:12,13 memorandum 124:1,4 125:8 125:11 127:10 128:13 129:22 138:3 141:16 142:4 memorializing 184:8 memory 74:11 74:14 103:21 134:6 151:5	169:22 mention 92:6 192:4,8 mentioned 104:3 166:4 merritt 4:7 message 23:20 80:4 190:13 246:3 messages 23:22 24:6 242:20 243:2,11,17,20 244:6,11,16,20 245:3,5,7 246:11,13,18 247:7,21 messed 161:3 messenger's 31:1 135:16 136:18 139:6 140:13 messengers 267:5 271:21 met 18:7 62:4 microphones 6:5 middle 1:1 6:17 midwest 278:16 281:1 military 83:10 ██████████ ██████████ mind 263:17 mine 264:1	ministry 184:15 230:13 231:3 minor 252:12 mintz 3:11 7:13 194:4,7 196:6 196:8,16 198:9 203:11 245:3 250:10,22 251:8 253:3,8 255:6 257:11 mintzandgol... 3:15,16 minute 27:4 42:10 80:5 131:2 192:22 208:6 213:14 232:4 234:21 261:21 266:10 minutes 29:3 50:10 169:11 191:18 211:4 272:19 mischaracteri... 26:6 29:8 36:10 49:1 51:4 68:10,19 104:22 106:5 107:4 111:3 112:5 140:18 147:5 149:20 152:7 188:17 206:13 210:19 227:14 229:8	mishandling 273:22 274:6,8 misled 140:8 misrepresented 140:10 missing 10:16 156:17 misspeaking 32:12 misspoke 32:11 mistake 173:15 272:15 mister 262:20 mistreatment 274:10 moment 124:7 189:6 monday 196:14 196:15,16 253:15 257:5,8 258:2 money 80:7,20 107:20 111:20 116:21 monitor 125:20 126:6 month 114:17 monthly 112:8 months 14:12 25:12 225:5,9 225:14,20 morning 257:3 motion 31:2 135:17 136:19 139:7 140:13
--	--	--	--

162:6 163:13 166:1 196:22 197:14 198:14 267:6 motions 253:7 move 54:3 85:21 221:8 moving 150:15 multiple 61:18 64:22 261:19 murray 2:5 7:20,20 mute 6:7 myers 18:14,16 18:22 19:18 20:4 30:12 31:8 86:17 112:22 122:21 122:22 124:13 132:3 187:3 243:14 245:14 264:19 265:4 265:10	named 46:8 48:5 names 114:14 241:4,8 270:16 naming 153:1 nancy 158:21 narrowing 200:14 nashville 1:2 3:6,21 6:18 129:7 250:10 250:14,15 253:3,4 255:7 255:9 270:22 nature 35:16 45:11 46:9 50:22 52:22 57:18 70:20 93:13 187:19 203:2 262:4 navigating 147:2,12 necessarily 166:22 168:12 184:9 need 11:22 22:2 42:5 44:10,16 44:18 63:17 102:20 103:9 105:12 124:21 125:15 148:19 161:5,14 180:20 193:7 194:12 196:22 200:22 214:21	215:20 238:8,9 255:8 259:1,3 264:5 276:4 needed 185:1 194:6,7 needs 184:9 253:3,5 neither 240:12 277:10 never 12:7 48:8 64:8,14,16,18 194:4,5,8 196:16 231:2 231:21,21,22 236:6,13,20,22 237:4 240:8 new 3:14,14 77:8,16 78:7 78:16 80:13 81:2,15 82:6 155:2,4 176:4 191:14 newland 1:17 7:4 277:2,20 news 80:1 82:17 191:12 258:1,4 night 80:2 83:3 83:6,13 84:1 84:14,22 85:5 nokes 4:9 8:8,8 non 258:13 nonconsensual 36:18,22	nope 67:5 218:22 northwest 1:14 6:21 nos 252:20 notarized 278:13 notary 277:1 277:20 278:22 279:10,18 280:15,23 281:23 notation 142:10 note 6:5 93:9 155:14,15 159:4 167:11 193:9 239:9 247:10,13 248:2,5 249:16 251:11 258:12 278:11 notes 35:9 126:4,4,11 164:10,13 165:10 171:3,4 notice 5:9 9:1 17:6,16 22:16 60:21 62:10 63:18 192:21 203:3 229:4 239:1 258:16 261:22 262:2 noticed 15:12 258:9
n			
n 2:1 3:1 4:1 5:1,1 6:1 n.w. 1:21 name 7:1 8:19 14:2,19 122:13 152:5 192:4,9 223:22 241:2 259:11 271:2 278:6 279:3,4 279:15 280:3,4 280:21			

noticing 7:8	246:20 272:13	102:13,17	186:1,11
notify 47:15	objected 193:9	104:14,21	188:14 189:7
notre 13:12	195:1 200:13	106:4 107:3	189:10,20
november	216:5 219:6	108:1,3,14,21	190:1,16
15:15 222:3	248:3,6	109:19 110:6	193:21 199:1
225:3	objecting 21:17	110:12 111:2	199:11,21
number 6:18	objection 26:5	111:11 112:4	200:8 201:8,11
9:10 16:18	28:8,17,17	112:11,18	201:22 202:10
65:13 69:6	29:7 33:10	113:4,14,21	202:18 203:19
70:5 123:18	34:7 35:5,17	114:7,20 115:6	203:20 206:12
131:9 158:14	36:9,10 37:10	116:8,17 117:5	207:1,7 209:17
160:20 161:18	38:1,13 39:12	117:6,16 118:4	210:18 213:5
169:1 171:20	40:2,3,11,21	118:10,22	214:19 215:8
183:8 187:4	41:8 43:11,22	120:1,11 121:7	215:18 216:4
192:18 193:1	45:4 46:11	122:1 130:3,12	216:16 217:7
198:19 199:18	47:2,18 48:11	132:8 135:2	217:11,14
208:9 230:1	48:22 50:1	140:17 141:20	219:17 222:12
232:6 278:7,12	51:2 52:9 53:2	142:5 143:14	226:8 227:2,13
numbers 5:10	53:22 54:14	143:17 144:18	228:10 229:7
5:11,12,13,14	55:11 56:13	145:19 147:4	233:7 235:4,18
280:7	57:6 58:2,10	147:17 148:16	239:9,13,16
numeral	60:3,4,8,14	149:10,19	243:22 247:11
132:21	61:2,20 62:14	150:18 152:6	247:13 248:3
numerous	63:5,20 65:1	153:5 154:2,12	271:7 273:15
195:2	65:11 68:9,18	156:21 157:6	objections
o	69:8 72:14	157:16 159:1	103:12 198:16
o 5:1 6:1	73:17 77:10	164:18 165:4	250:4
o'clock 84:1,13	79:4 80:15	166:9,20 170:2	obligated
85:5	81:4,13,16	170:21 174:16	194:10,13
oath 69:5 70:4	82:8,20 84:2	175:3,10	196:18
70:12 103:18	84:15 85:6	176:12,21	obligation
105:10,12	91:12 92:8,21	177:18 178:14	194:2 195:21
236:15	96:11 97:1,10	179:4,17 180:2	196:19,21
object 45:16,20	98:18 99:14,19	180:15 181:9	obligations
102:1 153:2	100:7 101:13	184:18 185:15	271:6,20

observations 134:5,17 141:5 143:11,21 144:13,15	oh 10:17 76:3 77:18 78:3 119:12,15 131:7 134:8	76:10,16 77:1 77:3,21 78:3,6 78:21 79:2,9 83:5 85:2 90:7	168:18 170:18 171:7 172:3 176:3,10,15 178:19 179:21
obvious 55:18	159:19 161:16	91:3,5 92:3	182:10 183:9
obviously 11:7 76:7 129:17 171:16,17	201:2 235:22 241:2 246:12 265:7,17 266:1	93:4 94:16 96:1,6,17 97:6 99:5 103:2,20	194:21 207:21 208:1,7,8,18 211:20 213:12
occasion 62:12	ohio 278:2	104:10 105:14	213:16,17
occasions 61:18	okay 8:10 9:4	105:18 106:9	216:14 217:6
occur 155:21 230:18	10:3,6,8,20,22 11:4,17,20	111:20 113:11 114:5 116:21	220:6,14 221:8 221:12,15
occurred 30:18 34:2,14,20 40:19 49:22 50:19 69:6 93:6 107:1 129:6	12:6,8,14,16 14:1,8 15:3,12 16:4,22 17:1 18:15 19:7,13 19:15 20:12,14 20:21 22:4 23:9,14,21 24:5 25:4,6,13	117:2 118:20 120:18 122:16 123:15,20 124:15 125:1 125:10,17 128:6 130:18 131:7,9,13,17 132:10,19 133:16,20 136:14,17 137:16 138:5,8 140:7 142:16 143:5,10 144:14 147:1 147:14 151:6 151:10 155:5,7 155:22 158:8 159:16,19 161:7,7,9,15 162:2,18 163:9 164:6,9 165:8 166:16 167:4 167:19 168:13	224:3,11,19 225:17 227:10 228:22 229:14 230:5,22 231:6 232:3,22 236:9 236:14,17 237:12 238:1,3 238:7,10 239:3 239:4 244:8 246:14 247:20 248:14 249:15 254:17 259:5 259:10 261:3 262:15 263:6 263:15 264:7 265:5 266:6 267:22 271:14 272:6 274:9
occurring 173:9	25:20 26:13		
october 266:13	27:9 28:2,14		
offer 181:5 198:10 209:5,7 239:10 259:21	29:2,16 30:1 31:17 39:2 41:15 42:14 44:13 45:7 46:20 47:9 56:22 57:16 58:20,22 59:5 59:8,12,15,20 60:18 64:9,16 64:20 66:18 67:2 69:2 70:3 70:18 71:19 74:17,21 75:5		
offered 196:10 196:12,13,15 200:13 234:8 257:5			
officer 31:22 32:22 70:13 71:5,6,7 95:18 136:9 139:16 277:2			
official 279:15 280:21			old 52:7,22 53:20 55:1 82:1,17 86:19 87:18 95:2

once 22:17 137:10 234:4 ones 245:7 250:4 open 254:18 opened 76:14 openly 91:9 operating 71:6 77:7 opportunities 255:19 opportunity 176:19 177:3 178:11 179:2 179:15,22 180:6,14 251:16 254:14 259:20 opposed 175:5 239:15 options 198:4,6 order 194:4 195:22 196:19 196:19 252:2 ordinary 23:6 152:20 178:20 org 88:11 organizational 217:17 218:4 original 214:22 originally 245:1 otchy 3:10 7:13 20:18,21 151:16 258:11	264:1 otchya 3:16 outcome 277:15 outside 39:12 40:3,21 41:8 43:22 47:18 49:11,12 53:2 54:14 55:11 58:2,10 60:4 61:3,21 62:14 63:6,20 65:1 72:14 73:17 80:15 81:5 82:20 84:2,15 92:7 98:18 107:3 108:4,14 109:19 110:12 111:12 112:4 112:19 113:4 113:21 114:19 115:6,17 117:6 117:16 118:4 118:10,22 120:2,11 121:7 122:1 145:2 147:18 148:16 165:5 174:17 175:10 178:15 179:5 180:2,15 181:9 185:16 186:12 188:15 189:11 190:1 190:16 199:2 199:21 201:8	201:11,22 202:19 216:16 226:8 overall 119:11 198:20 owed 188:12 own 66:12 143:2 149:16 180:11 205:8 225:22 227:7 242:7	162:17 163:3 165:20 167:3,5 167:13 168:21 168:22 169:1,2 172:4 174:15 183:8 187:14 204:2 205:11 209:12 212:2 229:19,20 232:19 233:1 234:15 265:1,5 265:15,22 266:10 271:13 275:5,7 278:12 278:14 280:7 281:3 paid 107:11,12 107:14,20 108:12 110:18 110:22 111:8 111:17,18 116:12,22 275:20 paige 144:4 paper 15:13 130:5,8,10,19 131:15,19 137:4 138:18 139:5 197:15 197:16 269:21 270:5 paragraph 167:6,7 183:10 183:10 187:16
		<p>p</p> <p>p 2:1,1 3:1,1 4:1,1 6:1 p.m. 1:13,13 6:4 93:20,22 93:22 94:1 158:18 165:11 165:13,13,14 169:3,19 238:15,17,17 238:18 250:11 250:14 276:10 276:12 page 5:2,7 10:19 11:1 12:12,15,17,18 13:17 25:13 42:10 43:7 124:16,16,22 132:1,18 138:2 138:4 139:3 141:6 146:13 151:13 161:17 161:18 162:13</p>	

pardon 221:17 269:8	participation 100:13	131:21 133:14 144:6 145:8	people 14:21 15:9 43:18
parse 29:2 72:8 72:8 175:1	participations 149:17	148:10 149:6,8 149:18 150:6	46:8 47:15 49:10,12 50:14
parsed 27:20 27:22 28:6 69:2 252:14	particular 7:14 70:11 137:10 167:16 230:17	150:16 151:15 151:21 152:5 152:15 153:15	50:19 52:19,20 52:20 54:9 55:6 57:19
parsing 28:14 68:6,15 175:7	233:1 234:18	153:21 160:16 164:7,16 165:1	91:20 98:9 132:15 137:19
part 29:18 37:17 38:7 48:8 50:14 51:14 71:20 72:3 87:12,15 87:16 106:21 107:20 117:13 126:1,19 174:20 176:7 178:3 180:12 181:20 185:11 188:8 203:6 205:16,19 255:12,13 275:1 280:9	parties 6:10 37:6,7 48:3 277:11,14	166:17 178:11 179:2,22 180:14 181:18 182:3 183:2,11 191:17,20,21 192:12 262:1 263:2 265:18 265:19,21 266:3,16,21 274:20,21 275:12	147:11,14 159:12 204:16 206:21 207:6 218:2 240:8 243:10 244:19
partially 59:9	party 155:11	pastor's 183:15	percent 117:20 117:22 120:8 121:13,18,19 121:20
participant 214:10	past 164:4 166:5	patrick 2:4 7:9 11:6 41:19 155:4 163:10 263:12,16	percentage 117:14
participated 43:8,19 48:7 49:13 55:6 57:19 86:2 96:2 99:12	pastor 4:10 7:10 25:2 30:7 31:5 32:7 39:11 43:17,20 45:11 46:10,22 47:17 48:9,20 49:21 50:13,20 50:22 52:4 55:7 57:3,20 60:13,21 63:16 65:22 72:3,9 73:1,14 86:2 86:19 87:17 89:15 90:19 91:21 93:14 94:9 95:13 96:10,20 97:8 98:17 100:5 106:22 127:19 128:10,17 130:1,22	patrick.sanders 2:12	period 53:15 88:13 89:20 135:19 136:21 137:14 139:9 140:15 141:19 142:22 144:17 153:3 163:15 166:3 274:5,12
participating 37:6 62:21 154:10		patty 8:1 pause 80:5 127:16 paying 109:11 263:8,8 pc 2:6 7:21 penalty 71:14	perjury 71:14 permitted 143:20 144:11 144:12 240:9 241:15 person 20:3 21:1 48:17

49:19 50:21,21 52:21 53:18 55:2 69:19 128:4 129:5,6 178:22 196:5 198:8 225:19 255:16,17 256:3,12 269:20 270:5 personal 33:12 33:13,17 34:8 35:6,18 36:12 36:14 37:14 38:2,14 39:14 41:1,10 43:12 44:2 46:1,12 47:3,20 48:13 49:7 51:5 52:11 53:5 54:16 55:13 56:14 57:7 58:4,12 60:9 61:4,22 62:16 63:22 68:20 71:8 73:19 80:17 81:7 82:22 84:6 85:8 98:20 100:8 111:13 113:6 115:8 117:7 118:12 124:7 153:6,8 154:4,15 179:6 179:7 180:17 180:19 182:6	189:12 190:18 193:14 199:3 200:2 202:2,11 215:13,22 216:19 219:12 219:19 220:2 254:9 257:11 personally 37:13 279:11 280:15 personnel 126:16 persons 114:14 220:4 pertain 110:15 129:12 pertaining 40:19 41:6 72:12 152:15 190:14 199:20 225:6 246:4 pharmacy 16:13 phase 64:6 phone 53:8 171:3 184:21 195:3 253:14 255:13,14,15 255:18 256:1 256:11 278:3 phones 6:7 phrase 64:4,6,8 64:15,19 physical 34:12 34:16,19	pick 6:6 picture 262:10 piece 15:13 pietsch 3:18 8:3 8:3 pigue 3:19 place 6:10 129:8 placed 155:18 placeholder 137:22 places 204:18 plaintiff 1:4 2:2 5:3,5,18 7:11 7:21 8:17 26:3 29:20 239:14 239:19 240:5 240:11 243:4 262:5 plane 197:22 257:1,2 played 156:13 256:17,18 257:9 playing 10:4 pleasant 253:14 please 6:5,7 8:20 10:12 11:5 18:20 46:5 59:8 67:4 75:6 94:3 131:2 138:4 139:22 151:14 154:21 156:1	164:1 165:16 193:1 195:7 200:21 208:13 215:3 231:15 236:11 238:20 278:10,10 pllc 3:19 plus 207:15 point 31:1 55:18 77:19 82:2 83:21,21 85:14 87:5 99:1 115:19,21 126:4 135:14 170:15 181:6 231:9 points 272:4,12 policy 241:17 portal 24:9 portion 26:2 27:8 123:9 127:14 129:11 130:7 133:10 138:11 139:14 142:9 144:2 145:7,7 150:10 173:2 180:1,6 181:18 182:2 183:1,3 184:22 217:21 235:14 237:16 239:18 240:4,13 260:5 260:12,13 portions 25:1 25:16 27:13
--	--	---	---

127:9 129:2,4 129:10,12,13 141:7 142:8 148:7,7 152:10 176:10 177:6,9 178:5 185:12 240:9 position 251:13 251:13,14,15 252:21 253:20 256:3 positions 220:3 255:2 positive 100:12 possibility 78:16 possible 81:19 82:17 255:6 possibly 15:11 74:12,20 81:12 106:18,20 110:8 post 145:16,22 191:6 199:20 poston 3:20 postpone 195:13 251:17 254:14 postponing 252:8 potential 241:14 potentially 39:4	practice 16:2,4 85:10 222:6,11 222:19 223:2 223:17 224:1,9 224:12,20 225:2,10,14,21 226:7 precluded 91:4 prefer 175:2 prejudice 262:2,3 prejudiced 250:19 251:4 preparation 18:17 21:19 74:22 150:4 187:11 190:9 190:11 211:21 226:20 233:1 234:12 preparations 211:4 217:10 prepare 17:19 21:10 199:8,13 200:16 202:16 203:16,17 204:3 210:15 215:11,15 216:2,10 218:7 219:2,14,20 239:6,21 242:19 246:11 prepared 24:3 30:16 41:6,13 93:11 129:15	193:5,11,12 197:4,9,12 200:6 201:6,15 204:1,2,15 209:14,16 210:10,16 211:7,14 212:8 215:6 216:7 217:18 219:10 225:15 239:17 247:9 251:21 276:4,5 presence 46:22 present 4:2,4 7:5 19:1,4 20:1 23:15,18 125:21 presidency 87:10,10 president 15:20 15:22 16:5 19:11 87:8,11 87:12,13,20 88:6,7 89:16 89:19 90:8 94:12 144:3 164:4,5 166:6 166:7 220:8 268:2,9 presidents 88:12 press 226:12 previous 41:18 51:7 96:14 97:3,12,16	217:13 229:8 previously 245:11 print 162:22 prior 40:20 43:8 49:21 51:4 56:2 57:22 85:2,2 93:6 98:7 123:10 138:13 185:9 224:1,12 234:18 258:17 259:14,16,21 260:5 274:14 private 6:7 privileged 100:15 probably 65:19 117:20 121:10 138:1 143:8 problem 162:14,21 251:18 253:18 257:20,22 problems 51:12 procedure 279:5 280:5 procedures 228:5 267:13 proceed 94:3 165:16 250:9 251:6 proceedings 250:20
---	--	--	--

process 24:1 51:8,14,18 52:3 53:11 74:9 97:18 104:12 127:13 153:12,14 178:3,4 179:8 179:10,19,21 184:5,20 196:4 produce 243:17 252:15 produced 148:15 254:6 producing 252:18 production 248:6 254:8 278:14,16,20 proffer 178:12 profile 9:5 10:11 11:12,15 12:4,10,13 13:21 promise 248:12 248:14,15 promoted 15:19,20 220:7 220:12,16 221:3,4,15,18 221:21 222:8 promotion 221:6,13 promotional 201:20 226:4,5	pronto 82:18 properly 12:18 14:6 propose 178:12 proposed 174:3 194:8 195:6 260:16,22 261:8 prosecutor 33:18 37:4 39:20 64:7 protective 194:4 195:22 196:19 protocol 124:16,20 125:22 126:1 126:20 127:9 153:1 173:11 179:12,13 protocols 129:8 provide 18:20 19:1 61:13 105:22 145:18 176:19 179:7 201:13 205:8 215:10 216:17 219:11 248:9 provided 24:8 24:16 35:4 61:12,17 130:11,20 131:19 133:5 134:4 138:12 141:3 145:6,14	158:9 177:5 181:21 183:11 188:6 200:19 252:1 255:19 264:14 providence 12:22 providing 70:22 123:2 254:13,19,20 public 277:1,20 279:10,18 280:15,23 281:23 publication 49:22 132:6 181:19 182:4 185:9 188:7 189:3 230:7 published 63:1 64:17 145:12 145:14 149:5 152:4 189:1 191:3 204:20 212:6 224:20 225:7,10 235:10 publishing 107:1 pulled 268:14 pulling 75:9 239:9 purpose 147:10 147:13 212:12	purposed 222:5 purposes 213:8 pursuant 123:13 143:19 pursue 226:6 pursued 227:11 put 9:8 16:17 25:4 40:8 49:16 71:22 133:17 146:5 167:17 204:16 205:14 213:13 250:8 254:6,7
q			
question 24:4 26:18,22 29:11 38:5 45:8,18 46:4,6 51:6 55:16 57:13 60:10 62:4,5,6 77:20 78:1 85:18 88:18 103:10 113:11 116:3 124:8 132:2 137:8 139:2,20 148:2 175:4 176:2,4 187:9 191:22 195:19 199:14 200:19,22 201:14 202:17 203:21 210:8 214:22 216:8 218:10 228:15 228:16,18			

236:17 256:10 questioned 49:10 questioning 85:15 238:5 questions 18:5 155:19 167:18 195:18 198:16 198:17 218:1 219:11 239:12 247:16 258:8 258:12 259:9 260:2 261:15 262:8 272:18 quickly 79:1 quite 138:1 229:22 quote 27:13 28:6 33:4 37:8 52:3,3 54:11 55:9 56:22 57:2 58:1 63:1 64:10 65:9 68:1 71:20 72:10 76:12 92:20 133:6 134:5 136:18 137:12 139:6 154:11 155:17 155:20 157:4 157:15 158:5 189:5 235:15 273:3 quotes 71:22	r r 2:1 3:1,2 4:1 6:1 rachael 188:6 raise 22:1 54:9 56:11 57:20 73:11,16 154:9 158:2 198:16 raised 53:18 54:22 55:4 56:19 72:12 78:2 97:7 98:8 98:15 99:11 101:11 103:12 166:17 raising 99:1 range 119:21 244:11 rate 108:20 109:18 112:1 rates 109:6 rather 157:14 reached 67:22 reaction 197:14 read 17:5,9 41:5 42:3,19 43:1,7 69:14 69:15 74:21 75:2 84:11 133:9 134:15 136:4,16 163:2 164:1 166:5 189:18 190:8 190:10 209:2 262:14 271:15	279:5,6,12 280:5,6,17 readers 189:5 reading 104:19 139:13,15,17 141:2,9 158:6 159:6 163:3 229:16 278:18 ready 129:4,16 197:22 realities 213:14 reality 140:10 213:18,22 214:2 234:22 really 29:13 74:14 143:8 263:13,13 reason 87:19 278:13 280:8 281:3 reasons 250:20 recall 30:4 31:22 32:2,9 35:20,22 36:2 43:14 52:5,6 52:13 55:21 57:14 61:6,8,9 61:10,11 67:11 67:12,15 73:21 74:17,18 75:2 89:8 94:14 109:13,14,16 122:13 128:21 130:16 132:14 132:17 136:22	137:3 143:4 149:7,14,16 150:1 154:7,16 160:10 168:5 183:5 187:12 189:9,14 190:12,20,21 192:17 242:4 260:7,10 270:14,15 271:2 273:18 274:15 recalled 113:9 receipt 278:17 receive 241:10 260:4 received 107:17 141:4 240:1,13 242:20 244:11 246:19 247:8 receiving 190:20 recently 17:10 17:11 210:22 recess 93:22 165:13 238:17 recognize 13:19 42:3 208:20 recollection 95:19,22 185:18 275:11 recommendat... 230:12
--	---	--	---

record 6:4,11 7:7 8:20 93:21 94:2 135:4 139:12,18 159:5 165:12 165:15 197:5 197:13 233:16 238:16,19 248:5 250:8 251:12 254:21 256:9 258:3,5 258:7,12 276:5 276:11 277:9 280:9 recorded 111:21 112:7 recording 6:9 recordings 183:15 records 23:3,6 redact 134:10 144:3 redacted 132:21 133:9 134:9 135:3,5 135:15,22 136:7,11 137:6 139:14 140:19 141:4,6 142:14 redaction 132:22 134:15 134:20 139:2,3 143:5 redactions 143:9	redline 177:14 177:15 reduced 109:6 277:7 refer 66:2 reference 39:3 39:5 64:11 78:9,14 130:21 146:3 148:10 149:8 152:10 160:15 162:4 200:9 226:16 230:2 232:14 235:15 273:2 278:7 279:2 280:2 referenced 66:14 279:11 280:15 referred 128:4 130:6 185:13 185:22 186:6 186:16,19 referring 59:15 59:22 105:6 184:13 202:22 205:6 218:3 275:3 reflect 254:21 256:9 reflected 171:4 198:14 reform 230:11 231:2	refresh 74:14 134:6 151:5 169:22 refundable 258:13 refused 195:9 regard 51:13 88:4 195:10 197:7 200:12 200:20 241:20 241:21 252:6 regarding 21:18 212:19 276:6 regards 193:13 registrant 16:11 registrants 16:8 registration 16:14 regretted 49:14 regulations 16:9 regulatory 16:1 reimbursement 258:19 rejected 37:17 related 26:3 69:19 131:21 183:13 240:10 241:16 277:10 relatedly 262:4 relates 239:18 261:10	relating 181:18 182:2 183:1 198:21 212:3 239:14,18 240:4,5 242:22 244:13 relation 226:6 238:4 251:10 252:19 relationship 144:5 relationships 218:2 relative 187:10 277:13 relativity 24:10 release 226:12 relevant 22:21 23:1 163:15 166:3 196:6 198:8,9 244:21 245:8 reliance 30:19 relied 33:18 36:19 relief 194:6,12 remain 248:7 252:4 remainder 204:3 remaining 250:4 268:20 remarks 187:17
---	--	--	--

remedy 251:10	repeating	144:21 145:1,8	220:4,9,21
remember	54:11	145:12,14,15	221:17,20
17:10 41:13	rephrase 62:4,5	145:16 146:1,4	222:11,19,21
74:13,18 87:12	report 5:17	146:10,22	223:18 224:13
88:8 90:18	19:10,13 25:1	147:2,8,12,15	224:19 225:6,9
91:17 94:7	25:17 26:2,2	148:5,6,15	225:15,20
106:16 108:17	27:5,6,8,14,19	149:18 150:7	227:11 230:2,4
110:21 122:20	29:21 30:8,10	152:4,10,22	230:8 232:15
122:22 123:4,7	30:16 31:6	153:15 155:11	233:1,4,11,20
123:12 132:13	32:7 37:22	157:9 159:21	234:15 235:10
149:4 151:1	38:9,19 40:18	160:13 171:11	235:13,14,15
166:14 181:12	43:10,17,21	172:22 173:3	235:17 236:7
189:2 241:3	45:12 46:10	173:10,17,18	236:11,21
270:19,20	47:1,6,16 48:5	174:1,9,15,21	237:1 239:14
273:13	48:6,10,19,21	176:7,8,11,20	239:16,18
remembering	49:11,16,22	177:10 178:6	240:5,10,14
106:14	50:6,14 51:12	178:13 180:1	242:22 243:3,4
remind 42:22	51:21 52:8	181:18,22	244:13 246:4
170:19	53:1,21 55:8	182:2 183:1	259:16,21
reminder 42:17	72:13 77:9	185:1,9,21	260:6 269:7,9
153:9	78:16 81:12	186:4,16 188:7	269:14,15
remotely 7:6	84:13,20 85:22	188:12,22	272:6
245:8	86:3 90:10	189:4,4 190:15	reported 1:17
remove 42:20	91:1 93:7	191:3 198:22	263:5
removing	94:10 96:9	199:20 200:9	reporter 7:3
114:13	97:8 100:6	201:21 202:9	89:3 279:7
renamed 222:6	111:9 115:5	204:13,19	reporting
repair 199:7	123:9 125:19	206:1,2,4,6,9	81:19 157:11
repeat 29:12	126:18 127:13	206:20 207:6	218:2,4,15
38:5 45:9 46:5	127:15,21	207:15 209:3	reports 214:7
46:7 57:17	128:12,18	212:5,13,18,20	218:14
127:20 128:11	129:4,17 132:5	212:22 213:1,2	represent
203:15 215:2	137:1,7,10,19	213:4,8,9,10	117:22 120:18
repeatedly	138:12 139:4,6	214:11,18	133:4 134:3
196:3,10	142:8,9,19	217:3 218:3	136:1,3,6

representation 135:4,8 136:10 139:16 141:8	46:21 49:15,20 51:16,19 52:2 57:3 96:9,18	responses 25:8 241:15 250:5	132:15 138:13 173:22 177:4
representations 136:8	98:3,5,8	responsibility 212:7 271:4	178:12 180:1,6 200:21 204:17
representative 7:15 9:2 17:14 21:19 125:20 193:18 203:18 252:4	reserve 253:10 258:18 261:21 276:2,6	responsible 30:10 204:10 211:8 212:11	213:4 246:10 246:12 247:3 247:18,22 278:11 279:1 280:1
represented 140:9	reserved 276:15	responsive 248:1,20	reviewed 17:11 18:7 26:1,10 26:13,15 28:7 29:5 30:15 35:8 112:21 128:1 129:2 171:14 274:14
representing 7:2,14	reserving 253:10	rest 100:15 205:4	reviewing 21:14 26:16 129:9
request 199:22 246:21 248:1 248:20 249:1,4 249:7,10,13,17 252:14,19 280:9,11	resolution 194:3	restate 175:20 175:22 176:1 276:4	reviews 128:3
requested 253:4	resolve 248:15 251:2 253:9 256:21 257:6	result 53:12 220:21	rh 172:14,17
requests 195:2 248:4 254:8	respect 35:2 39:2 40:7,16 54:7 56:9 58:22 64:21 66:18 101:2 198:7 204:7 214:18 230:5 258:19	retained 5:18 267:7	right 9:7 12:21 13:15,17 15:17 16:15 21:3 22:17 23:2 26:20 28:7 30:3 31:14 33:1,3,6 39:7 39:11 40:1,7 40:10 41:19 48:10 50:16 56:7 62:13 64:7 67:5,6 68:8,17 70:8 71:5,10,17,21
required 196:2 278:22	respond 77:1 249:1,4,7,10,13 251:19	returned 177:6 278:17	
requirements 218:5	responded 79:1 79:2	reveal 18:2	
research 236:3	responding 69:12	revealed 135:17 136:19 137:13 139:7 140:14 141:18 142:21 144:16	
reservation 45:10 48:19 50:7,21 52:6 52:21	response 9:1 66:15 70:11 228:4 248:10 249:17 272:17	review 21:6,9 22:10 23:2 24:10 25:10 35:3 113:3,12 114:5 123:10 125:18 126:6 126:12,17 127:13 128:5 129:4,5 132:5	
reservations 45:2 46:9,16			

Case 3:23-cv-00243 Document 219-12 Filed 07/03/24 Page 326 of 342 PageID #: 4958

225:16 226:12 samantha's 218:15 sandbag 198:13 251:20 sanders 2:4 7:10 11:9 155:5 159:17 163:4 263:20 saw 141:7 173:8 241:20 saying 20:19 32:19 45:20 50:18 53:9 68:16 115:17 140:1 173:19 182:17 195:3 207:22 213:3 223:16 230:22 231:1 235:22 237:20 248:10 255:21 says 76:12,20 125:17 133:2,6 134:5,13 136:9 139:18 140:1 156:4 164:3 166:1 169:15 169:16 170:10 172:13 188:1 207:15,17 209:3 229:20 249:18 250:3 265:3 267:4,17 267:18 268:19	sbc 5:4,16 78:18 88:2,3,3 88:6,7 89:16 89:19 90:3,8 94:13 107:15 107:21 110:4 111:9 112:8 114:17 115:4 122:17 146:12 164:4 166:6 201:16 204:1,7 205:9,17 207:15 209:3 210:17 211:5 213:2 214:7,16 221:20 223:12 227:12 230:3,6 232:14,21 235:13 240:3 241:16 259:6 267:5,6,19 268:2,10 270:11 271:6 271:20 272:8 272:14,18 275:1,19 scarlett 4:9 8:8 school 13:9 schwartz 32:1 32:2 33:1 95:20 100:11 scope 33:11,14 36:11 37:11 39:13 40:3,22 41:9 44:1	47:19 53:3 54:15 55:12 58:3,11 60:4 61:3,21 62:15 63:6,21 65:2 72:15 73:18 80:16 81:5 82:21 84:3,16 86:5,20 87:2 91:1 92:7,12 95:11 96:8,21 98:12,14,19 101:4,12,16,17 101:22 102:4,6 102:12 103:14 104:2,5,12,12 104:19 106:3 107:4 108:4,15 109:20 110:13 111:12 112:5 112:19 113:5 113:22 114:19 115:7,17 117:6 117:17 118:5 118:11 119:1 120:2,12 121:8 122:2 147:18 148:17 154:5 154:13 165:5 174:17 175:11 178:15 179:5 180:3,16 181:10 185:16 186:12 188:15 189:11 190:17	199:22 201:12 202:1,19 215:9 216:17 226:9 261:10,13 264:14 273:3 scott 2:5 3:9 7:12,20 278:5 scott.murray 2:11 screen 5:15 9:13 130:19 159:18 160:9 163:1 208:5 245:18 screenshot 11:12 245:8 screenshots 24:7,15 244:20 scroll 10:12 seal 279:15 280:21 seasoned 33:19 seattle 270:21 sec 225:6 240:13 second 5:9 11:4 17:6 129:13 133:7 134:20 148:20 155:5 167:10 213:18 219:5 239:7 251:4 265:2 270:1 273:9 seconds 163:1
--	---	--	--

section 30:10 30:15 164:17 170:10,14 172:13 173:1,4 173:5,6 214:7 218:3 224:4 260:17 261:12 267:3,22 272:9 272:10,20 273:2 sections 148:7 173:22 securing 15:6 see 9:13 10:9 10:18 13:18 16:20 25:18 42:10,13 66:7 66:12 75:9 76:3,17 78:10 79:14 80:4 102:20 103:4,9 103:18 104:7 105:12 123:22 124:3,17,22 125:2,15 126:7 127:4 132:20 134:16 135:5 135:20,21 139:10,15 141:7 142:15 143:2,20,21 144:11,12 146:9,13 147:2 147:11 148:20 150:4,9 153:18	155:3,6 156:11 156:19 157:1 161:9,10,11,16 163:16 167:9 167:14 168:1 169:2,8,13,17 170:12,13,14 170:15 172:5 172:15 183:17 187:7,20 206:9 208:7 209:1 214:22 215:20 225:4 227:7 232:13,13,16 234:2,14,14 240:9 243:6 251:1 253:9 255:10 258:6,7 265:1,9 266:3 266:3 267:9,20 268:5 271:22 272:4,9 274:3 seeing 103:7 135:3 142:7 160:17 187:12 229:1,1 273:1 seek 195:22 seeking 258:19 seen 11:18 12:7 12:12 25:7 64:16 67:10 78:19 131:18 141:9 148:8 157:21 265:20	select 227:20 227:20 228:7 230:1 selectively 179:14 send 79:15 181:17,17 182:1,2 245:8 sending 74:18 83:20 183:1 senior 15:16 26:1 220:7 sense 38:18 135:13 149:2 227:9 sensitive 6:6 sent 75:11,14 82:14 83:22 113:1 124:5 125:11,14 141:2 158:17 171:5 172:10 185:7,8 195:2 245:6 258:2 274:15 275:11 sentence 69:16 106:12 138:11 separate 21:22 22:3 42:21 43:3 128:2 133:12 155:18 167:17 214:15 260:5 265:19 september 15:15 277:22	sequence 170:19 254:6,7 serious 252:17 252:17,18 served 270:17 270:17 services 110:19 115:4 session 259:1 sessions 183:14 183:16 set 61:12 71:9 257:4 267:15 seton 13:8 setting 129:20 settle 82:1 seven 52:20 53:10 54:9 55:6 56:11 57:19 73:7,8 85:21 86:1 94:19 95:4 98:9 100:2 several 14:20 22:6 147:7 sexual 34:12,16 34:20 36:8,18 77:8,16 78:7 78:17 80:13 81:19 82:5 123:1 124:1 125:11 141:13 153:2 181:21 186:5,10,17,17 187:19 188:8
--	--	--	---

191:22 205:13 205:15 206:16 214:3 228:4 240:18 263:3 274:10 shape 223:19 share 145:2 shared 127:21 128:12,18 shares 199:19 sheet 278:12 280:7,10,18 281:1 short 79:15 shots 245:18 show 30:4 41:15 105:15 131:10 203:14 208:6,6 232:4 236:10 237:13 237:14 238:2,2 263:18 showed 150:9 152:9 269:14 269:15 shown 129:17 129:19 155:4 160:8,12 259:15 278:15 sic 171:19 side 72:21 196:1,9 sign 265:19 signature 265:19,20	276:14 277:19 278:13 signed 70:14 231:21 264:17 265:4,7,8,9,21 266:6 279:13 280:18 significantly 116:11 signing 266:4 278:18 similar 253:13 258:16 262:4 simple 222:22 simply 246:14 sincerely 278:19 single 45:10 48:17 49:19 52:6 82:5 104:11,18 191:22 210:16 252:15,19 260:16,22 sir 16:15,15 103:10 278:9 sit 93:11 103:21 208:3 236:19 site 209:10 situation 258:16 six 14:12 43:18 46:8 50:14,19 51:3 52:19,19	53:9 192:13 225:8,9,14,20 254:8 sk 172:14,19 slade 265:19,21 266:4,16,21 274:20,21 275:13 slade's 265:18 slow 162:15 small 162:22 163:3 239:15 smaller 124:22 snapshot 5:15 social 199:20 sociology 13:4 solemn 70:20 solution 226:22 227:22 solutions 1:7 1:14,20 3:8 6:13 7:2,4 8:2 17:15 107:14 107:18 111:18 226:17 227:8 228:7 229:20 267:7 278:1 281:1 somebody 81:19 99:1 142:17 147:1 154:10 231:20 someone's 44:14	somewhat 74:12 132:16 soon 77:4 79:2 255:6 sorry 10:17,19 20:19 22:12 32:10 42:15,21 43:5 45:14 55:16 67:7 79:8 86:15 88:16,19,21 89:1,4,13 102:16 108:2 112:14 113:8 117:6 119:12 128:2,14 132:17 145:20 151:13,17 155:15 156:9 160:5 161:3 167:3 168:22 172:2 175:13 175:16 190:5 217:5 219:3 230:16 231:15 243:3 244:14 258:22 262:10 263:14,16,19 264:4 265:8,18 266:1 271:2 sort 159:10 189:14 255:14 sorts 32:20 sound 121:1
---	--	--	---

sounds 12:1 132:16 186:3 247:14 southern 1:6,8 2:13 3:17 6:15 7:19 8:4,6,9 111:22 227:22 262:22 266:18 266:22 267:5 278:6 279:3 280:3 spalding 158:21 159:5 speak 18:15 23:14,17 24:11 27:10 54:10 100:10,13 105:21 193:11 193:12 194:20 194:20 197:12 215:6 216:7 speaking 39:20 159:9 198:11 198:12 232:2 273:14 speaks 159:2 specific 27:9 34:4 85:12 101:10 102:20 103:6,10 106:11 123:5 130:16 137:3 244:10 254:7 266:9	specifically 25:15,21 27:3 27:12 39:21 55:8 86:11 90:12 122:12 140:9 167:15 194:7 199:8 214:1,11 240:10 251:17 257:14 268:19 272:2,9 275:12 specifics 104:6 132:17 spelling 114:13 spend 21:14 85:11 spent 80:7,11 80:20 81:2 84:21 120:8 121:6,21 spoke 23:15 75:19 76:13 93:5 99:3,5 spoken 18:1 103:22 255:15 sponsored 223:6 stamps 161:20 stand 68:22 96:14 97:3,12 153:12 157:18 179:8,19 233:13 239:11 250:5	standpoint 164:16 stands 77:20 172:17,19 start 9:4 85:22 started 26:19 234:5 starting 47:15 state 7:6 8:19 15:13 55:5 89:7 279:10 280:15 stated 26:10 36:17 40:14 139:10 statement 45:9 62:6 104:13,17 141:1 144:7 147:5 149:20 152:7 174:22 175:5 188:18 206:13 210:19 279:13,14 280:19,19 statements 38:18,19,21 90:11 93:13 115:11,12 180:7 203:4 215:6 states 1:1 6:16 71:13 140:18 stating 57:21 189:4	stayed 84:21 stenotype 277:7 step 133:14 212:3 stephanie 185:4,5 187:3 188:5 steps 60:19 199:17 216:2 216:10 229:6 244:8 stipulate 120:20 stipulates 121:2 stop 231:16 story 42:11 stream 156:14 street 1:14,21 2:7,17 3:4 6:21 strike 26:14 35:12 39:4 50:11 55:4 63:13 87:15 102:9 136:14 142:17 149:6 173:7,20 179:12 189:1 235:10 structure 217:17 218:15 struggling 109:6
--	--	---	---

study 13:4 subject 250:5 submission 123:11 138:14 submitted 84:20 242:3 subscribed 279:10 280:14 281:21 subsequent 242:11 substance 16:9 substances 16:14 sufficient 51:10 51:10 52:14 53:12,14,16 54:7,20 98:11 98:13,16 99:6 99:13 100:4,18 suggested 124:15,19 127:1 suggestion 241:22 suggestions 240:1 241:10 suite 1:15,21 2:8,18 3:5 6:21 278:2 summarize 12:18 summarized 14:6	summary 41:6 129:14 superior 278:1 supposed 231:17,19 247:3 sure 10:13,21 25:11 27:1 29:10 30:9 53:6 70:19 88:15 93:16 109:8 111:16 111:17 121:2 127:17 128:6,8 151:7 163:2 192:18 204:18 204:20 205:3 206:19,20 207:5,21 208:2 223:15 229:22 236:12,14 surprise 137:2 137:7 254:19 surprised 185:10 253:16 survivor 167:7 167:22 185:22 186:6,10,18 205:17 survivors 114:14 186:6 186:17 207:16 209:4 213:3 214:4	swear 8:11 72:1 switch 178:8,8 switching 122:6 swore 71:19 sworn 8:16 234:21 277:5 279:10,13 280:14,18 281:21 t t 5:1,1 tab 201:16 204:1,7,15,16 204:22,22 210:17 211:5 211:11 212:12 214:16 take 6:10 19:20 41:16 60:19 75:5 83:12 85:14 93:17 113:19 146:9 160:2 165:9,10 187:14 196:13 198:15 209:11 212:1 214:6 216:2 229:6 233:12,21 235:16 238:13 244:8 252:20 257:1 263:10 264:21	taken 54:18 56:17 126:4 277:3,6,12 takes 209:12 212:2 214:3 talk 94:19 200:9 201:15 204:1 223:14 223:21 227:19 234:22 250:20 talked 75:18 96:19 97:21 98:4 245:3 talking 76:4,6 77:18 119:11 182:12 212:4 230:15 247:2 257:7 task 84:21 122:17 123:1 123:11 124:1 125:12,19 138:14 141:14 145:13 146:5,6 146:18,19 181:21 188:8 204:20 205:2,5 205:7,13,15 206:5,5,16 212:6 214:13 230:11 231:3 233:22 234:1 236:8 240:3,11 240:15,18,22 241:11,21
--	---	--	--

260:17 263:3,5 266:18 267:7 267:19 275:16 taylor 3:19 team 145:3 153:16 181:6 185:11 255:20 teams 20:11 129:19 145:7 160:9,13 270:6 technical 11:7 tell 17:13,18 24:14 27:11 44:11 65:7 70:16 72:9 80:6 84:10,10 84:12,20 85:9 103:2,7,11,11 115:2 128:16 132:6,22 136:5 138:17 141:13 141:17,22 142:3 148:13 148:13 152:3 161:18 168:4 180:9,9 193:17 198:19 199:17 214:9 216:14 239:5 253:5 266:14 telling 52:18 110:20 231:14 ten 15:2,7 tennessee 1:1 3:6,21 6:18	129:7 250:10 253:3,5 255:7 term 268:22 terminology 57:1 terms 14:9 16:6 16:7 36:8 37:5 37:19 40:8 57:10 60:19 95:3 106:1,2 121:1 122:8 123:5 153:1 178:11,19 191:16 220:3 267:15 testified 8:16 25:22 132:3 188:11 200:14 211:3 213:13 217:22 229:5 229:12 238:3 242:1 243:5,9 245:2 260:15 testify 104:11 193:6,18,22 194:13 196:20 199:18 200:7 200:16 203:3 211:4,7 212:8 217:19,21 233:9 248:17 251:21 252:4 testifying 107:10 236:15 236:18	testimony 17:15,19 21:7 24:21 26:6 28:16 29:8 32:9 36:10 49:1,18 50:4 51:4 55:21 59:6 68:10,19 70:22 72:4 74:22 94:8,14 104:22 105:3,9 105:11 106:5 107:4 111:3 112:5 140:18 156:13 190:9 190:11 194:11 194:14,16 195:1 196:12 199:8 200:12 201:6 203:17 209:15 214:2 215:16 226:20 227:14 229:9 233:2 234:12 234:20,20 239:22 246:18 247:7 251:22 259:14 273:10 273:14,18 274:16 277:4,6 277:9 279:6,7 280:6,9,12 text 23:20,21 23:22 24:6 74:3,5,19	75:11 76:9,12 76:16 78:7,10 78:14 79:13 80:4 83:20,22 84:19 85:12 133:5,14 134:4 156:5,14 157:21 158:7 242:20 243:2 243:11,17,20 244:6,11,16,20 245:2,4,7 246:3,10,12,18 247:7,21 texted 84:13 texting 84:22 85:4 texts 243:7 thank 10:18 16:22 18:6 19:3 26:8 33:16 41:17 62:7 66:8 104:9 131:10 155:7 159:19 160:5 163:10 167:20 176:15 193:4 201:4 238:14 258:5 261:17 262:15 276:1,8,9 thing 10:14 16:20 131:11 210:14,15,16 244:18 252:13
---	--	---	---

265:17 things 12:3 22:22 51:17 90:15,15,16 94:18 96:19 98:4 113:20 114:15 127:17 177:21 241:16 242:16 248:15 251:1 253:9,20 255:10 256:21 think 10:16 18:14 44:15 67:20 70:1,1 86:11 87:13 109:7 110:2 116:11,12 134:19 151:1 153:1 161:6 166:4 171:1 173:11 179:1 184:9 189:5 190:10 193:3 218:14,16,19 222:3 224:18 237:15 241:21 243:5,12 270:7 thinking 184:11 252:16 third 3:12 48:3 134:14 139:3 155:11 187:16 thirty 278:17 thomas 4:3 7:1	thorough 228:3 thought 22:21 49:14 63:13 76:21 105:19 175:19 242:14 244:20 thoughtfully 238:4 thoughts 183:16 184:8 thousands 80:12 81:1 three 29:3 34:15 39:3,5,9 39:22 40:8,9 54:10 55:9,19 56:5,10 57:4 66:20 72:5 73:8 116:15 195:4 211:3 243:12,13 time 1:13 6:8 21:14 43:8 46:14 47:5,11 49:21 50:5 53:8,10,19 54:3,4 61:12 62:12 63:10 75:17 77:6,17 78:9,12,15 80:7,11 82:2 83:7,10 88:10 88:13 89:10,16 89:20 90:9,20 91:6,18,22	93:20 94:1 96:10,18 97:7 105:17 108:9 108:10 111:21 111:22 112:3,7 113:3,19,20 117:14 121:6 129:3,18,18,21 135:19 136:21 137:14 138:1 139:9 140:11 140:15 141:15 141:19 142:11 142:22 143:3 144:17 146:15 150:1 152:4 153:4 156:13 160:14,17 163:15 164:15 165:2,11,14 166:3,19 170:15 181:3,5 192:11,14 198:11,15 204:19,19 211:9 212:4,5 212:9 216:15 220:19 221:5 222:4,8 231:9 234:9 235:10 235:12 238:15 238:18 250:19 256:5 257:4 258:5 264:6 266:17 269:19	270:1,3,13,22 274:5,12 276:8 276:10 times 20:1 65:8 125:21 129:2 191:14 195:5 timing 96:21 titles 220:3 today 8:22 17:19 24:22 28:1,15 46:18 67:9 74:22 93:11 94:19 96:19 103:21 109:18 187:11 200:14 208:3,7 208:20,21 209:15 211:11 226:21 236:19 246:11 247:9 248:10 251:3 253:18 254:8 256:18 258:14 260:4 273:10 together 68:5 69:15 151:11 271:12,15 told 34:11,14 34:15,18,21 40:10 50:9,12 56:6 111:15 197:21 228:16 237:15,19 257:16
--	--	---	--

tomorrow 21:20 153:10 182:18 203:7 251:7 252:5 255:3,5 258:14 276:6	212:1,17 232:19 topic 29:15 137:8 192:22 193:6,10,13,18 193:22 194:11 194:14,16 195:1 197:13 199:8,12,18 200:6,7,17 203:10,16,18 204:4 209:16 210:15 215:5 215:12,17,20 216:3,5 217:10 217:19 218:7 219:1,2,6,15 239:5,6,10,11 242:18 246:21 247:11 252:11 252:12	254:3 total 22:7 52:20 116:4,11,12,12 116:15 117:10 119:16 198:19 199:18 totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	136:3 139:4 140:3,5,6 142:16 203:22 223:7,11,13 230:20 249:19 256:6 260:20 277:9 trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
tomorrow's 252:6,8 276:3	194:14,16 195:1 197:13 199:8,12,18 200:6,7,17 203:10,16,18 204:4 209:16 210:15 215:5 215:12,17,20 216:3,5 217:10 217:19 218:7 219:1,2,6,15 239:5,6,10,11 242:18 246:21 247:11 252:11 252:12	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
tone 57:9	199:8,12,18 200:6,7,17 203:10,16,18 204:4 209:16 210:15 215:5 215:12,17,20 216:3,5 217:10 217:19 218:7 219:1,2,6,15 239:5,6,10,11 242:18 246:21 247:11 252:11 252:12	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
tongring 1:11 5:6,8 6:14 7:15 8:14,21 9:10 14:3 16:18 26:1 29:19 43:1 123:18 158:14 160:20 167:12 171:20 187:4 193:8 208:9 232:6 239:8 251:6 252:2 254:2 276:13 278:8 279:4,9 280:4 280:13 281:20	topic 29:15 137:8 192:22 193:6,10,13,18 193:22 194:11 194:14,16 195:1 197:13 199:8,12,18 200:6,7,17 203:10,16,18 204:4 209:16 210:15 215:5 215:12,17,20 216:3,5 217:10 217:19 218:7 219:1,2,6,15 239:5,6,10,11 242:18 246:21 247:11 252:11 252:12	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
tongring's 250:6 276:7	topics 17:20 22:11,13,18,21 23:1 33:11,15 60:22 61:12,13 61:17 62:11 63:9,18 78:1 115:7 122:6 178:8 188:15 199:2,22 201:12 202:1 202:19 203:1 215:9,17 216:17 229:8 251:21 252:5,9	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
tonight 79:15	60:22 61:12,13 61:17 62:11 63:9,18 78:1 115:7 122:6 178:8 188:15 199:2,22 201:12 202:1 202:19 203:1 215:9,17 216:17 229:8 251:21 252:5,9	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
took 24:7,15 70:17 146:19 164:10 171:3 199:17 211:4 216:9	60:22 61:12,13 61:17 62:11 63:9,18 78:1 115:7 122:6 178:8 188:15 199:2,22 201:12 202:1 202:19 203:1 215:9,17 216:17 229:8 251:21 252:5,9	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12
top 14:2 89:8 162:5 165:20 170:8 209:2,2	60:22 61:12,13 61:17 62:11 63:9,18 78:1 115:7 122:6 178:8 188:15 199:2,22 201:12 202:1 202:19 203:1 215:9,17 216:17 229:8 251:21 252:5,9	totality 56:18 totally 11:8 touch 30:13 touching 187:18 tpmblaw.com 3:22 trail 197:15,16 trained 152:21 transcribed 279:7 transcript 278:10,11 279:5,12 280:5 280:11,17 transmitted 269:7,9 transmitting 269:11 travel 258:13 treat 253:18 treated 253:17 tricky 21:22 tried 195:6,8 196:1 215:9 251:22 253:18 true 35:22 61:16,16 71:15 118:20 135:12	trustee 87:12 trustees 88:12 truth 141:15 151:8 237:22 truthful 47:16 70:12 truthfully 28:21 237:11 try 74:8 104:6 195:3 255:14 255:18,22 256:10 257:6 trying 24:16 68:11 86:11 151:5 162:12 208:17 218:14 223:11 262:10 turn 25:13 132:18 192:20 192:21 turned 153:3 twelve 118:17 twice 269:10 two 21:22 22:3 33:19 37:8 56:9 57:22 66:1,20 72:6,7 73:7 106:11,12

106:14 107:10 110:21 128:2 128:22 129:1 129:10 132:4 132:15 134:16 163:1 171:16 243:10 250:17 type 109:4 types 109:1 typewriting 277:8 typically 61:13 204:14 242:12 typos 241:16	under 71:13,13 103:17 105:10 105:11 138:10 228:7 236:15 267:6,14 277:8 understand 12:11 29:11 35:11,13 44:4 55:15 64:5,6,9 64:13,20,21 65:4 77:11 128:7 181:14 182:13,19,19 184:5 185:14 193:20 223:15 230:17 244:5 246:17 253:12 256:3 262:19 262:21 268:14 271:3 understanding 39:17 70:20 109:17 231:19 268:7 understood 39:19 40:18 111:21 117:2 undertaking 70:21 undisputed 56:10 uniform 186:16 uniformly 186:6	unilateral 115:12 116:1 203:4 unilaterally 257:7 258:15 unit 6:12 united 1:1 6:16 71:13 university 13:9 13:12 unnecessary 209:18 253:21 unqualified 45:8 unquote 33:5 36:6 37:9 55:9 58:1 63:2 65:9 68:2 71:21 72:11 92:20 154:11 157:5 157:15 158:5 273:4 unsigned 265:2 untrue 230:19 233:17 256:8 unusual 83:18 187:16 unwelcome 187:18 updated 148:5 148:6 updates 205:8 uploaded 24:9 use 44:19 45:1 45:2,2	used 29:4 64:4 160:10 using 57:1 120:7 utilize 206:10 230:13 v v 278:6 279:3 280:3 validation 55:2 various 49:10 49:12 204:18 veracity 48:6 49:11 verified 70:12 veritext 1:14,20 7:2,4 278:1,7 281:1 veritext.com. 278:16 version 127:20 128:11,18 130:2,5,8,10,20 131:15,19 135:5 136:7,11 140:19 141:5 158:6 185:8 234:18 versus 6:15 vice 15:20,22 16:5 19:11 220:8 victims 274:10 video 6:9 20:13 256:1,11
u			
uh 59:14 76:15 76:22 77:5 92:2 120:4 127:18 134:9 134:18,22 169:4,20 172:7 183:7 209:8 224:14 225:12 234:17 262:18 264:16 ultimate 88:5 98:13 ultimately 98:4 112:22 un 135:3,5 136:7,11 139:14 140:19 unable 216:5 unavailable 195:5			

269:18 videoconfere... 20:10 videographer 4:3 6:3 7:3 93:20 94:1 133:17 155:22 165:11,14 238:15,18 276:10 videotaped 1:10 276:12 277:3 view 26:17 147:14 179:6,7 180:17,19 212:22 221:9 256:15 viewer 212:13 214:10 views 153:7 198:20 199:19 virginia 2:19 virtual 129:19 virtue 96:20 218:13 visited 206:21 visitor 209:6 vs 1:5	waived 278:18 want 8:10 11:7 14:19 16:16 59:2,5 69:22 80:6 82:12,13 84:18 94:6 102:19 105:19 127:16 139:2 162:5 165:18 171:9 178:2,9 181:2 191:17 193:13 194:11 197:3,4 198:15 203:6,14,14 208:1 214:1 228:18 233:12 233:14,15 234:2 236:10 236:12,14 237:13 238:2 240:14 247:20 247:22 248:16 255:22 256:2 257:11 258:6,9 258:12 259:8 259:13 260:3 263:18 272:19 wanted 16:15 22:1 24:3 67:18 79:14 80:1 82:16 116:1 147:11 161:12 182:18 182:19 195:14 197:16 206:9	251:18 257:22 wants 74:9 258:8 washington 1:15,21 6:21 191:5 waste 264:6 way 10:14 12:7 12:13 25:21 32:8 55:5 70:11 113:19 205:20 211:15 223:19 250:8 253:1 256:22 257:6,14 275:17 ways 175:2 we've 73:12 84:10 96:19 98:12 115:10 156:5 158:11 165:8 216:11 250:19 262:3 web 146:18 204:2 229:19 website 5:15,16 145:17 146:1,4 146:6,7,8,20 147:2,12,16 198:21 200:10 201:17 204:8 204:16,17,21 205:1,3,8,11,12 205:15,22 206:5,10,16,20	206:21 207:13 208:20,21 209:6 210:17 211:6,17,22 212:17 213:1,9 213:14 214:11 214:16 226:15 226:16,18,21 227:1,8,21 230:14 231:4 232:4,18 233:22 234:8 235:14 236:5,8 236:21 237:3 websites 234:7 wednesday 258:3 week 196:12,13 256:18 258:18 weight 38:10 38:17 welcome 94:5 238:10,13 went 101:16 140:19 153:16 167:8 168:1 186:4 204:15 205:1,22 274:20 west 2:19 122:14 wester 122:15 158:20 159:8,9 whatsoever 59:19 106:1
w			
w 122:14 wait 161:3,16 251:19 waiting 167:12			

whispering 6:6	74:10 77:11	150:22 151:19	222:15 226:11
wife 185:13	78:3 79:5,8,10	152:9 153:12	227:5,16
willing 219:7	80:19 81:8,18	154:7,15 155:7	228:20 229:11
248:7,7 252:4	82:7,17 83:2	157:1,9,18	233:13,15
256:10	84:4,18 85:9	159:16,19	234:19 235:6
wish 253:13,17	88:16,19,21	160:7 161:6,21	235:19 240:7
withdraw	89:1,4 90:5	162:2,9,20	244:2 245:22
228:19	92:11 93:1	163:6,9,11	247:1,6,17
witness 8:11,15	96:14 97:3,12	164:20 165:7	248:9,16 258:8
9:18,20 10:3,5	98:22 99:16,21	166:12,22	258:22 259:5
11:10 16:22	100:10 101:15	170:4 171:1	263:13,19,21
18:6 19:3	102:3,19 105:2	173:9,13	264:2,4,7
20:19 22:4,6	106:7,18 107:6	174:10 175:13	271:10 275:8
24:4 26:8	108:2,6,17	176:3,15 177:2	277:4,6,10
28:11,20 29:10	109:1,22 110:8	177:21 178:4	278:8,10 279:1
31:14,17,19,21	110:15 111:5	178:17 179:8	279:4,11 280:1
33:16 34:10	111:15 112:7	179:11,11,14	280:4,15
35:8,20 36:14	112:21 113:8	179:14,15,19	witnesses 30:20
37:14 38:4,16	113:16 114:2,9	180:5,20	34:15 39:3,6,9
39:16 40:5,13	114:22 116:10	181:12 184:20	39:22 40:8,9
41:3,12 43:14	116:18 117:9	185:18 186:3	54:11 55:10,19
44:4 45:5,14	117:19 118:14	186:15 188:19	56:1,5,10 57:4
46:14 47:5,22	119:3 120:4,14	189:14 190:20	64:11 174:10
48:15 49:9	121:10 122:3	199:5,15 200:4	178:9
50:4 51:6	123:20 124:12	201:1,3,15	witness' 278:13
52:13 53:6	130:5,15 131:4	202:4,13	[REDACTED]
54:5,18 55:2	131:7,9,13	203:22 206:15	[REDACTED]
55:15 56:16	132:10 135:10	207:8,11	[REDACTED]
57:10,14 58:6	138:7 139:20	210:21 213:7	[REDACTED]
58:14 60:16	141:1 142:7	214:21 215:2	[REDACTED]
61:6 62:2,18	143:19 144:20	215:11,20	[REDACTED]
63:8 64:2 65:4	145:20,22	216:7,9,21	[REDACTED]
65:16 66:7	147:7,20	217:5,15	[REDACTED]
68:11,22 69:11	148:19 149:12	218:12 219:3,9	[REDACTED]
72:17 73:4,21	149:22 150:20	219:19,21	[REDACTED]

[REDACTED]	122:22 124:2	worked 204:16	111:5,16
[REDACTED]	124:13 132:3	working 82:3	119:14 125:9
[REDACTED]	172:10 185:7,8	221:22	131:13 133:19
[REDACTED]	187:3 188:11	works 251:9	134:13 136:1
[REDACTED]	243:14 245:14	254:18	144:10 151:17
[REDACTED]	245:14 264:20	world 153:20	151:19 155:1,3
[REDACTED]	265:4,10	worry 53:15	158:13 160:18
[REDACTED]	woodstock	write 125:8	161:7 162:2,14
[REDACTED]	164:7 184:14	155:10 169:19	163:6 167:10
[REDACTED]	word 27:22	242:12	171:1 201:3
[REDACTED]	28:3 29:4,5	writes 156:16	215:1 221:18
[REDACTED]	38:17 44:8	170:9	224:10 243:1
[REDACTED]	83:12 103:22	writing 83:13	258:22 263:21
[REDACTED]	104:11,18	140:10 164:14	264:2,3,6,6,6
[REDACTED]	175:9 241:22	189:2	265:8 270:7
[REDACTED]	248:14 260:16	written 82:15	275:7
[REDACTED]	260:22	123:1 136:22	year 13:14 52:7
[REDACTED]	words 27:20	137:4 139:5	52:22 53:15,20
[REDACTED]	28:15 29:2	184:4 258:4	55:1 82:1,17
[REDACTED]	68:6,15 69:2	wrong 20:20	86:19 87:18
[REDACTED]	93:5 137:4	44:16,21 49:14	89:11 95:2
[REDACTED]	138:15 142:20	76:5,8 87:11	117:15 118:3,9
[REDACTED]	163:18 175:8	wrote 125:10	118:21 119:18
[REDACTED]	180:11	126:1,2,10,11	120:9 121:5,13
[REDACTED]	work 64:7	126:14,15,21	121:18,22
[REDACTED]	82:13 83:16	126:22 127:6,9	152:1
[REDACTED]	85:10 107:12	129:22 138:10	years 14:12
[REDACTED]	107:13,15	140:12 141:12	33:18 40:20
[REDACTED]	108:10 109:12	141:16 153:15	56:2 57:22
[REDACTED]	110:4,11 111:9	163:18 166:13	93:6 106:11,15
woman 271:1	117:3,10 120:9		107:2,10
wood 18:14,16	121:13 220:13	y	110:21 215:7
18:22 19:18	223:6 254:21	yeah 11:21	217:18
20:4 30:12	255:18	28:11 44:17	yep 161:21
31:8 86:17		58:17 66:7,9	
112:22 122:21		85:16 95:9	

yesterday 19:17,19 york 3:14,14 191:14
z
zoom 2:5 4:4 42:21 43:3 129:19 133:12 145:6 152:11 155:18 160:9 160:13 163:4 167:14,17 269:18 270:2,6

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.